New York ISO
Independent System Operator

FERC Show Cause Order on Large and Co-Located Loads

Prasad Shinde
Manager, Interconnection Studies
Francesco Biancardi
Senior Market Design Specialist

MC

October 28, 2026

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Agenda

- FERC Show Cause Order
  - Review of Key Themes
  - Review of Consumer Protections
- Overview of Large Load Integration Procedures
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  - CLLC Out-of-Merits
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- DER Modeling Improvements and Baseline Enhancements
- Buyer Side Mitigation
- Next Steps

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Schedule

- **October 2026**
  - 10/28 MC Presentation & Vote
- **November 2026**
  - 11/16 Section 205 Filing

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Previous Presentations

Date/Working Group	Presentation Title	Subject Matter
July 23, 2026 ESPWG	Large Load FERC Show Cause Order	NYISO presented its initial proposed framework for addressing FERC's Large and Co-Located Load Show Cause Order
August 13, 2026 ESPWG	Large Load FERC Show Cause Order	NYISO responded to stakeholder feedback on market participation opportunities for Large Loads, discussed updates/clarifications to the LLIP process and some associated definitions, reviewed process maps for Co-Located and Partner Generators as well as New Large Load Projects and Existing Loads, and reviewed proposed Large Load technical, performance, and operational requirements.
August 20, 2026 ESPWG	FERC Show Cause Order on Large and Co-Located Loads	NYISO responded to stakeholder feedback and presented additional detail on the market design
September 1, 2026 ESWPG	Large Load Integration Procedures: Proposal in Response to the FERC Large Load Show Cause Order	NYISO presented more detail on its Large Load Integration Procedures.
September 8, 2026 MIWG	FERC Show Cause Order on Large and Co-Located Loads - Market Rule Tariff Proposals	NYISO presented more detail on aspects of the market design including DER Baseline Enhancements, Partner Generator Arrangements, telemetry and metering requirements, and settlements, and provided preliminary draft tariff revisions.
September 14, 2026 ESPWG	Large Load Integration Procedures: Proposal in Response to the FERC Large Load Show Cause Order	NYISO presented updates to its proposed Large Load Integration Procedures.
September 22, 2026 MIWG	FERC Show Cause Order on Large and Co-Located Loads - Market Design	NYISO presented updates, additional details, and examples on market design elements.
October 1, 2026 ESPWG	1. Large Load Integration Procedures 2. FERC Show Cause Order on Large and Co-Located Loads: Market Rule Tariff Updates	NYISO presented key updates to the Large Load Integration Procedures and provided proposed tariff language to reflect planning procedures and design
October 7, 2026 ESPWG	1. Large Load Integration Procedures 2. Market Rule Tariff Proposals & Consumer Protection Assessment	NYISO presented key updates to the Large Load Integration Procedures and provided proposed tariff language to reflect planning procedures and design
October 14, 2026 ESPWG	Large Load Integration Procedures	NYISO presented key updates to the Large Load integration procedures and provided proposed tariff language to reflect planning procedures and design
October 21, 2026 BIC	FERC Show Cause Order on Large and Co-Located Loads	NYISO presented a comprehensive description of the proposed Large Load market design and Large Load study process and associated procedures, as well as associated proposed tariff revisions

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FERC Show Cause Order

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FERC Show Cause Order

- On June 18, 2026, FERC issued Show Cause Orders to each FERC-jurisdictional RTO/ISO and their FERC-jurisdictional Transmission Owner ("TO") members on the topic of large and co-located load integration (EL26-69)
- NYISO was required, within 30 days of the issuance of the Order, to submit a report on Resource Adequacy in the NYCA and how NYISO intends to ensure that adequate generation will be available to serve existing and new large loads
  - On July 20, 2026, NYISO filed its Resource Adequacy Informational Report
- On August 3, 2026, NYISO requested an abeyance from FERC to place the Show Cause proceeding on hold for 90 days to allow time to work with stakeholders to develop a Section 205 filing
- FERC granted the NYISO's, the NYTOs', and the Non-Incumbent TOs' motions for abeyance on August 14, 2026
  - The Section 205 process will involve the normal tariff filing process (MIWGs/ESPWG, BIC or OC, and MC votes on tariff language, etc.)
  - Accordingly, NYISO will work with stakeholders to further develop design and tariff language for the Section 205 filing which is due by November 16, 2026

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Show Cause Order – Key Themes

- **Speed to Power**
  - There are barriers in the Load and Generator interconnection and planning study processes that impede speed to power
- **Robustness of Planning/Interconnection Study Processes**
  - NYISO's existing study processes must be able to better analyze the potential transmission security and resource adequacy impacts of large and co-located load integration
- **Cost Allocation/Cost Shifting**
  - NYISO's existing transmission and ancillary service cost allocation methodologies do not allocate costs commensurate with the benefits/costs that individual entities receive/create and FERC has concerns about possible cost-shifts if Large Loads do not pay for Network Upgrades they cause
    - This is especially relevant to co-location arrangements
- **Service Rights, Co-Location, and Load Flexibility**
  - NYISO's study, interconnection, and transmission/resource adequacy service treatments do not account for the unique operating characteristics of large and co-located Loads
- **Ongoing Operational Requirements**
  - NYISO needs to implement additional Real-Time operating requirements for Large Loads to maintain grid reliability

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Consumer Protections

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Consumer Protections in the NYISO's Large Load Design

- **Many of the design features in the NYISO's Large Load design are there to protect consumers. Some examples:**
  - Shielding consumers from Capacity costs:
    - Clearly identifying capacity obligations of FWS, NFWS and ZWS Load and allowing mixed service awards because it provides incentive for Loads with Limited Withdrawal Rights to take actions to acquire Firm Withdrawal Service, and to potentially qualify for additional capacity supply revenue opportunities.
    - Large Loads that cause impacts to Resource Adequacy must pair with Associated Resource(s) in order to become eligible for Firm Withdrawal Service, and the Associated Resource(s) must certify a Capacity Bilateral for each Obligation Procurement Period with the Large Load. This minimizes the capacity costs increases for existing Loads from the entry of the new Large Loads.
    - Associated Resource must remain available for 15 years; early exit can reclassify the associated Large Load as NFWS;
    - A System Reliability Benefit Fee (SRBF) based on the amount of Non-Firm Withdrawal Service and/or Zero Withdrawal Service that a Load is taking, not tied to actual MWh, charges these Loads for the reliability benefits that they receive from the NYISO capacity market. The allocation of the resulting residuals to LSEs helps offset the cost of capacity for existing loads. The Load MWs with a Large Load taking NFWS and ZWS are not included in the IRM, and therefore cannot increase the amount of ICAP that LSEs need to procure through Auction

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Consumer Protections in the NYISO's Large Load Design

- Shielding consumers from Energy Market costs:
  - Large Loads seeking Firm Withdrawal Service may also mitigate energy market impacts by entering into an arrangement with "new supply via co-location in the same Capacity Region" since the additional supply may prevent the Large Loads from increasing the demand for energy
  - Applying Operating reserves, black start, VSS, regulation, FERC, NYISO budget, residual and other charges to all Large Loads on a gross load basis regardless of Withdrawal Rights compared to applying these charges on a Net Load basis today helps to prevent unreasonable cost shifting to existing Loads.
  - Large Loads taking NFWS are subject to a $200/MWh bid price-cap, which serves to prevent large loads from driving up LBMPs and mitigates the likelihood they will cause reliability issues.
- Transparency of interconnection related costs:
  - Increased readiness obligations for Large Load projects including application fees, study deposits, and commercial readiness screening
  - Large Load Integration Procedures (LLIP) study process including a System Impact Study, and Assessment of Load Integration and Resource Adequacy study to determine the level of FWS. Projects pay the costs of the studies.
  - Clear rules on project modification of proposed or existing loads.

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Consumer Protections in the NYISO's Large Load Design

- **Promoting reliable and efficient operations also shields consumers:**
  - Co-Located and Limited Load Configurations are subject to penalties for failure to follow withdrawal dispatch, offsetting consumer's costs to meet reliability deviations caused by dispatchable Large Loads
  - Good operational visibility: including six second telemetry and hourly revenue grade metering; results in more accurate and reliable solutions.
  - The CTO/NYISO may require remote disconnection and controls to enforce NFWS/ZWS injection/withdrawal limits; Large Load bears equipment obligations and costs.
  - Individual and NYCA-wide Large Load ramp limits, and ride-through requirements.
  - Co-Located and Limited Load Configurations must timely respond to ISO/TO OOM instructions and may request OOM through the TO consistent with service.

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Large Load Integration Procedures Overview

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Key Updates to LLIP

- **Presentation:**
  - Clarifications throughout presentation
  - Slide 17 – new definitions
  - Slide 26 – resource adequacy evaluation process for State Exempt Large Load Projects
- **Attachment LL materials:**
  - Attachment LL is posted with stakeholder materials
  - Updates to Attachment LL for the Management Committee were posted on October 26, 2026, and highlighted in yellow
  - Incremental revisions to Attachment LL compared to Attachment LL posted with materials for 10/21/26 BIC/OC meeting is included with stakeholder materials for awareness

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Key Aspects of the Proposed Large Load Integration Procedures

- **Requirement that Large Loads must not adversely impact resource adequacy.**
  - Large Loads must mitigate their adverse impact to resource adequacy with the following:
    - Associate with new supply (either Co-Located or Partnered), and/or
    - Take a new Non-Firm Withdrawal Service option.
- **Requirement that Large Loads must not adversely impact transmission security.**
  - For transmission security violations that may be resolved by taking Non-Firm Withdrawal Service, Large Loads must choose one of the following to mitigate adverse impact to transmission security:
    - Pursue Network Upgrades,
    - Take a new Non-Firm Withdrawal Service option
  - For transmission security issues that can only be resolved with Network Upgrades, a Large Load must pursue Network Upgrades.

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Key Aspects of the Proposed LLIP, cont.

- Increased readiness obligations for Large Load projects, including application fees, study deposits, readiness deposits, and site control screening
- An optional pre-application process and mandatory application process
- LLIP study process including a System Impact Study, and Assessment of Load Integration
- Defined processes for evaluating Co-Located Large Loads
- Performance requirements for Large Loads
- Modification process for Large Loads
- Project tracking process for Large Loads

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Applicability of Large Load Integration Procedures

- **Large Load Integration Procedures apply to:**
  - A proposed commercial or industrial load, located at a single site or in close proximity, behind one or more POIs, that has a peak load of 50 MW or greater proposing to connect to the New York State Transmission System
    - Close proximity: located within 2 miles and 2 electrical buses, and in the same Capacity Region
    - Exclusion for loads:
      - Public safety facilities and providers of essential services
      - Station service
      - Critical Electric System Infrastructure Loads (as defined in NYISO MST section 2.3)
      - Proposing to connect or connecting to the Long Island Transmission District at a voltage of 69 kV or below
  - Proposed modifications to existing loads satisfying the above requirements
  - Proposed modifications to Large Load Projects under evaluation in the Large Load Integration Procedures

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Applicability of Large Load Integration Procedures

- **Computational Large Load definition:**
  - "a Large Load Project that primarily consists of information technology infrastructure used for: (i) creating, executing, and delivering software applications and services, (ii) artificial intelligence training, development, and delivery, (iii) cryptocurrency mining, or (iv) other computational activities at a data center"
- **State Exempt Large Load Project definition:**
  - "a load project: (i) that satisfies the definition of a Large Load Project and (ii) for which an authorized representative of NYDPS provides to an Eligible Customer a verification in accordance with ISO Procedures that the Large Load Project should be evaluated under the requirements of Section 44.8.1.5 of this Attachment LL"
  - Eligible Customer must indicate it is eligible to be a State Exempt Large Load Project, either during the submission of the Integration Request or during ALI Entry Decision Period
- **State Exempt Large Load Project Verification definition:**
  - "a form in accordance with ISO Procedures that an authorized representative of NYDPS provides to an Eligible Customer to verify that a Large Load Project should be evaluated under the requirements of Section 44.8.1.5 of this Attachment LL"
- **Non-Computational Large Loads may request exemption for specific performance requirements**

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Associated Resources

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Large Load and Associated Resources

- **Large Loads may associate with resources via two arrangements**
  - Co-located (behind the same POI)
  - Partnered (not behind the same POI, but in same capacity region as the proposed Large Load)
- **Associated Resources may mitigate some or all adverse impacts observed in the resource adequacy evaluation depending on their characteristics**
- **Changes to arrangements with Associated Resources would be evaluated under a modification process**

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LLIP Study Overview

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LLIP Study Components

- **90-day Resource Adequacy and Modeling Period ("RAMP")**
  - Determine the resource adequacy impact of a Large Load project (including Co-located or Partner Generators, if applicable) to determine the preliminary amount of Firm and Non-Firm Withdrawal Services to be offered to the Large Load
  - Determine the preliminary attachment facilities
  - Determine the preliminary physical infeasibility
  - Model Large Loads and develop the SIS study package
- **90-day System Impact Study ("SIS")**
  - Non-binding and informational
  - Perform transmission security analyses and preliminarily determine the impact allocation of each Large Load project to adverse reliability impacts, if any
  - Preliminarily determine if and how much Non-Firm Withdrawal Service can address the adverse reliability impacts, if any,
  - Preliminarily identify Network Upgrades (with preliminary non-binding cost and time to construct estimates) necessary to mitigate the adverse reliability impacts, if any
- **Assessment of Load Integration ("ALI")**
  - Determine resource adequacy impact, perform transmission security analyses and determine the impact allocation of each Large Load project to adverse reliability impacts, if any
  - Determine the amount of Firm and Non-Firm Withdrawal Services to be offered to the Large Load
  - Identify Network Upgrades necessary to mitigate the adverse reliability impacts, if any

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NYISO LLIP Process Overview

Pre-Application Fee

Pre-Application (Optional)
NYISO: identifies CTO | CTO: POI screening and determination, establishing baseline and uprate MW amount for existing loads

Application Fee | Study Deposit 1

Application (Mandatory)
NYISO: validates IR, identifies CTO/ATO(s)/Affected System(s), performs site control screening

Resource Adequacy and Modeling Period (RAMP)
(90 days)

Part 1

CTO: physical infeasibility screening, preliminary attachment facilities determined

NYISO: Resource Adequacy evaluation

Project models built and validated

Study base cases developed

SIS Entry Decision
(7 days)

Will customer proceed to SIS?

Limited project modifications allowed

Affected Systems Notified

Part 2

Study base cases revised and auxiliary files are developed

SIS scope developed

Scoping Meeting with customers and TOs

SIS scope provided to TPAS/OC

SIS
(90 days)

Bundled study to determine adverse reliability impacts NYISO for BES CTO/ATO for non-BES

EMT study screening

CTO/ATO: Identify cost/time estimates for preliminary Network Upgrades

NYISO: Identify preliminary withdrawal service MW determination* based on observed criteria violations, preliminary impact allocation of violations

Customer Review of SIS results (14 days)

Results Meeting with customers and TOs

SIS Results to TPAS/OC

ALI Entry Decision
(7 days)

Will customer proceed to FS?

If yes, optional upgrades or non-firm withdrawal service?

Limited project modifications allowed

Study Deposit 2

Readiness Deposit

Affected Systems Notified

Assessment of Load Integration (ALI)
Part 1

NYISO: Update SIS findings, update impact allocation for BES issues, identify updates to withdrawal service MW determination*

Facilities Study (FS)
(performed by TOs)

CTO/ATO: final upgrades and estimates, (including evaluation of alternative transmission technologies)

Negotiation of Interconnection and Construction Agreements and cost allocation based on impact allocation

ALI
Part 2

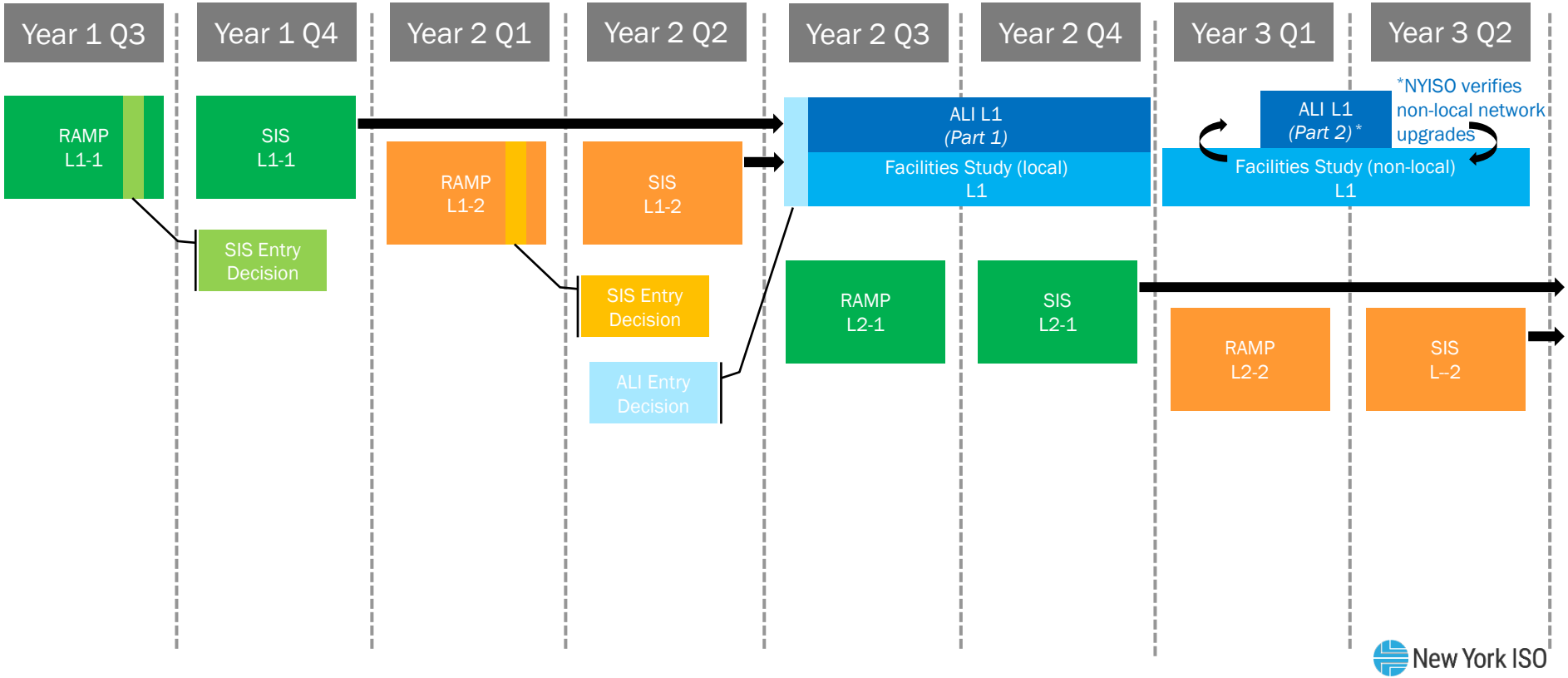
NYISO: Confirms non-local upgrades as identified by the TOs

Three party Transmission Services Agreement

*Including Firm Withdrawal Service and Non-firm Withdrawal Service, as well as eligibility to be classified as Zero Withdrawal Service Load

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Sample Quarterly Schedule



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Resource Adequacy Evaluation

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Resource Adequacy Impact Standard

- **Large Loads subject to the LLIP shall not adversely impact NYCA resource adequacy**
  - To mitigate the adverse impact to resource adequacy, Large Loads must be associated with a Co-Located Resource or Partner Resource (such as generation) and/or take Non-Firm Withdrawal Service
  - Large Load projects will be assessed on their impact to resource adequacy, not whether there is a violation of resource adequacy criteria
- **For Large Load projects that are not identified as State Exempt Large Load Projects, NYISO will apply the Resource Adequacy Impact Standard to determine level of firm withdrawal rights**
  - If load does not co-locate or partner with new resources, then Non-Firm Withdrawal Service if Resource Adequacy impact over 25 MW
  - If load co-locates or partners with new resources that adequately mitigate the load's resource adequacy impact, then Firm Withdrawal Service*
  - If load co-locates or partners with new resources that partially mitigates the load's resource adequacy impact, then partial Firm Withdrawal Service

*Firm Withdrawal Service is still subject to mitigating any transmission security violation. Large Load would only obtain Firm Withdrawal Service once co-located or partner resources are in service.

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State Exempt Large Load Projects

- **For State Exempt Large Load Projects in an LLIP cycle, NYISO will evaluate the collective impact of these projects to determine level of firm withdrawal rights**
  - If the collective impact of such projects within a Group does not violate the resource adequacy criterion contained in the NYSRC Reliability Rules for years 1 through 5 of the study, then those projects will be eligible for Firm Withdrawal Service in their full requested amounts.
  - During RAMP Part 1 process, the results will remain informational.
  - During ALI, if the collective impact violates the resource adequacy criterion, then the NYDPS will be notified and provided 60 days to update the list of State Exempt Large Load Projects.
    - If the collective impact of the remaining State Exempt Large Load Projects does not violate the resource adequacy criterion, then those projects will be eligible for Firm Withdrawal Service in their full requested amounts.
    - If the collective impact of the remaining State Exempt Large Load Projects violate the resource adequacy criterion, then those projects are no longer eligible as State Exempt Large Load Projects and will be evaluated in accordance with the resource adequacy impact standard used for projects that do not qualify as State Exempt Large Load Projects.

*Firm Withdrawal Service is still subject to mitigating any transmission security violation.

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Queue Withdrawal Rules

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Withdrawal

- **A Large Load project will be withdrawn from the LLIP when it (a) submits written notice of withdrawal or (b) fails to adhere to all requirements in the LLIP including, for example, the following circumstances**
  - Failure to timely pay a monthly invoice
  - Failure to cure a Large Load Integration Request deficiency within the allotted time
  - The Large Load project does not elect to continue to the SIS at the SIS Entry Decision Point
  - The Large Load project does not elect to continue to the ALI at the ALI Entry Decision Point
  - The Large Load project does not satisfy a milestone demonstrating that the Eligible Customer accepts its cost responsibility for Network Upgrades and Attachement Facilities in accordance with the requirements established by the applicable Transmission Owner within fourteen (14) Calendar Days of the completion of the Facilities Study
- **Withdrawn projects must re-enter the LLIP with a new Large Load Integration Request**

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Large Load Modifications Proposal

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Modification Requests

- **Large Loads (and existing loads greater than or equal to 50 MW or requesting an incremental increase for a total of 50 MW or greater) must submit a modification request for changes, such as:**
  - An incremental change to the requested withdrawal amount of 1 MW
  - Load type and operating characteristics
  - Interconnection configuration
  - Co-location arrangements including the addition of new Generators, changes to existing or planned Generators consistent with the current modification rules for Generators (Attachment HH)
- **NYISO will determine (with input from the CTO/ATO/Affected Systems) if the requested modification is deemed material based on the nature of the modification**
  - Studies will be performed, if needed, to evaluate the impact of the modification
    - MW thresholds that trigger studies are described in next slide
  - Studies may include limited sensitivity analyses or inclusion in the next available LLIP cycle

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MW Threshold Subject to LLIP Study Procedures

Load Status	LLIP Modification Study Trigger <u>No</u> Change to Load Type (compared to baseline MW)	LLIP Modification Study Trigger Change to Load Type (compared to baseline MW)	Baseline MW**
Existing Projects			
Grandfathered in Group A	**+10 MW** de minimis	Any change	As documented in June 2026 NYISO Interconnection Queue
In-service before 6/18/26	**+50 MW** de minimis	Any change (if total is 50 MW or greater)	As determined by CTO
Future Projects*			
Proposed	Any change	Any change	As proposed in IR
In-service	**+10 MW** de minimis	Any change	As proposed in IR (or as last studied under LLIP)

*Including loads in service before 6/18/26 after 50 MW de minimis threshold is exceeded
**Baseline resets after completion of modification review and Eligible Customer proceeds with modification, or as last studied under LLIP, as applicable

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Load Affected System Study

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Load Affected System Study Process

- **When NYISO is notified by a neighboring Transmission Planner/Planning Coordinator of a proposed load project for which NYISO and NY TOs may be affected, NYISO will commence a Load Affected System Study (LASS) to evaluate the reliability impact of the proposed load project**
- **NYISO will identify and notify any potentially impacted NY TOs, arrange a scoping meeting, and develop the LASS scope**
  - The scope will identify the transmission security analyses to be performed
  - NYISO is responsible for evaluating BES, and TOs are responsible for evaluating non-BES
  - The LASS will commence upon agreement of scope finalization by NYISO and NY TOs

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Load Affected System Study

- **NYISO and NY TOs will develop a LASS report, and provide the report to the neighboring Transmission Planner/Planning Coordinator**
  - If adverse impacts to reliability are identified, NYISO and NY TOs will identify potential Affected System Upgrades(s), and provide preliminary cost and time to construct estimates in the LASS report
- **Affected System Upgrades(s) may then proceed directly from the Transmission Interconnection Application to the TIP Facilities Study as described in Attachment P to the NYISO OATT**

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Large Load Performance Requirements

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Performance Requirements

- **Large Loads will be subject to performance requirements**
  - Large Loads must meet the most stringent of all applicable performance requirements, e.g., NERC, NPCC, NYSRC, or CTO performance requirements
  - Non-Computational Large Loads may request exemption from specific performance requirements
  - Performance requirement details will be documented in NYISO procedures
    - The specific criteria listed in this section are preliminary and subject to change
  - Large Loads taking Non-Firm Withdrawal Service must meet the Active Power Ramp Rate requirements and be able to follow base points—i.e., be fully dispatchable
  - Existing load projects will not be subject to the Large Load performance requirements under the Large Load Integration Procedures unless there is a material change their load type and operating characteristics
- **Performance requirements include:**
  - Operating
  - Protection and control
  - Monitoring

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LLIP Transition Proposal

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Transition Plan Considerations

- **This proposed transition plan shows how load projects currently in the NYISO interconnection queue may proceed**
- **To the extent possible, this potential transition plan aims to:**
  - Not disrupt existing commercial arrangements
  - Allow a reasonable amount of time for finalization of nearly complete agreements
  - Consider system reliability implications
  - Continue existing and ongoing study efforts

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Preliminary Transition Plan Outline

- **A project's transition plan depends on the milestones achieved by the project as of the dates indicated below:**

Transition Group	Milestones Met	Transition Plan	Eligible For Group* *(preliminary estimate)*
A	1. IR submitted before 6/18/26; **and** 2. OC approved SIS scope before 6/18/26; **and** 3. OC approved SIS report before 3/1/27; **and** 4. Execution of one or more Qualifying Agreements before 11/16/26; **and** 5. Facilities Study ongoing or completed before 11/16/26 or not required; **and** 6. Security and/or milestone payment posted to CTO and/or ATO by 3/1/27	Grandfathered	3.6 GW
B	1. IR submitted before 6/18/26; **and** 2. OC approved SIS scope before 11/16/26; **and** 3. OC approved SIS report before 6/1/27; **and** 4. Execution of one or more Qualifying Agreements before 6/1/27; **and** 5. Not included in Group A	Transitional LLIP Study ("L0")	9.8 GW
C	1. Not included in Group A; **and** 2. Not included in Group B	L1	TBD

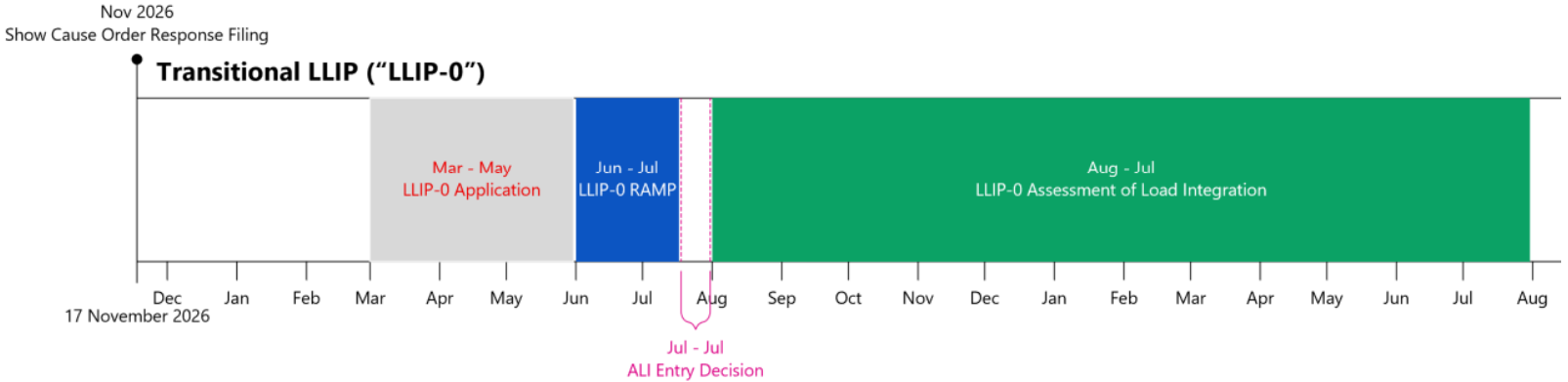
*Excludes in-service loads and loads that do not meet the proposed Large Load definition. Based on available information and subject to change.

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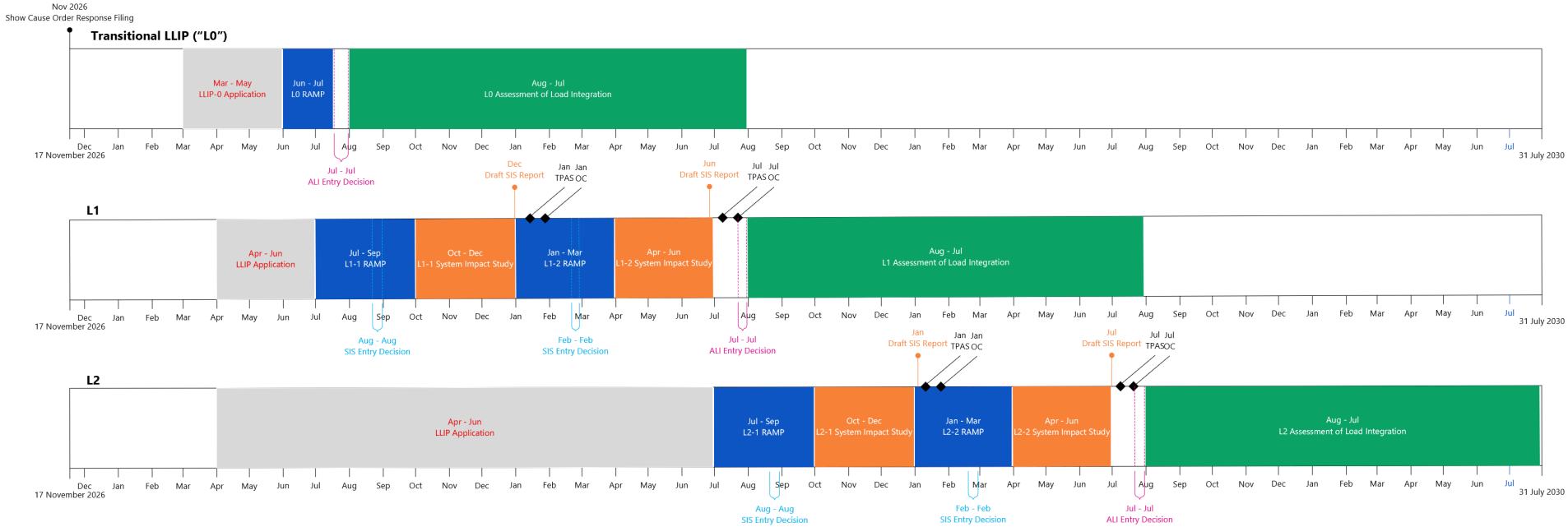
Proposed Transitional LLIP (“L0”) and Potential Schedule

- **L0 would consist of:**
  - Application opens 3/1/27 (Application fee required)
  - Resource Adequacy and Modeling Period (6/1/27 through 7/15/27)
  - Assessment of Load Integration (8/1/27 through 7/31/28)
  - NYISO would not perform a new SIS for these projects



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Proposed LLIP Cycle Schedule



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Large Load Tracking

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Project Tracking Process

- **Proposal for a new load interconnection webpage on the NYISO website for hosting information on Large Loads including:**
  - Project tracking spreadsheet including project size, in-service date, project type, location, status, etc.
  - Geographical maps
  - Dashboards with visuals summarizing projects by type, size, status, and location
  - Network Upgrade tracking spreadsheet for projects that have completed an SIS including the type of equipment, cost estimates, and status of Network Upgrades
- **Information on the load interconnection webpage to be updated monthly**

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Large Load Market Design

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Withdrawal Services in the Markets

- **FWS Loads may use the transmission system to serve their Load in a price agnostic manner**
  - The MW associated with the portion of a Large Load taking FWS will be included in the Load Forecast used to establish the IRM and LCRs
  - FWS Loads are eligible to participate in the NYISO's Demand Response programs
- **NFWS Loads use the transmission system, subject to a nodal $200/MWh LBMP curtailment threshold**
  - NFWS Load MW are excluded from the Load Forecasts that are used in establishing the IRM and LCRs
- **ZWS Loads are Large Loads that have not requested Withdrawal Service rights, and therefore cannot withdraw Energy from the transmission system**
  - ZWS Loads will be served entirely by either a Co-Located Local Generator or by a Co-Located Resource(s), as part of a Co-Located and Limited Load Configuration (CLLC)

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Large Load Cost Allocation

- NYISO proposes to assess fees and charges to all Large Loads, regardless of Withdrawal Service rights, on a gross Load basis
- This treatment includes, but is not limited to, the following fees and charges:
  - Operating Reserves Charges
  - Black Start Charges
  - VSS Charges
  - Regulation Charges
  - FERC Fees
  - NYISO Budget Fees
  - Residuals
  - BPCG, DAMAP
  - Import Curtailment Guarantees
  - Supplement Event Credits
- NFWS/ZWS Loads will additionally be subject to the System Reliability Benefit Fee, to allocate ICAP market costs to these Loads commensurate to the benefits they receive from ICAP Resources

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Large Load Data Monitoring and Reporting

- **All new Large Loads will be required to provide the following data to inform Real-Time operations, scheduling, and settlements:**
  - 6 second Real-Time telemetry
  - Hourly Revenue Grade Meter Data
  - Hourly DA and RT Load forecasts
  - PMU data and Phase 1 metering as applicable
  - Separate and direct telemetry of Load at co-located facilities
  - Separate and direct metering of Load at co-located facilities
  - Other information and data NYISO reasonably needs

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Large Load Protection and Control Mechanisms

- **Large Loads will be required to install and pay for control mechanisms that serve to mitigate the reliability risks they present to the system**
  - The CTO will reserve the right to remotely disconnect Large Loads when necessary to maintain reliability of the transmission system
    - NYISO may request the CTO remotely disconnect a Load for reliability on its behalf
- **Control technologies and/or protection systems may be necessary to limit a transmission customer's withdrawals from the transmission system, as relevant to their service classification**
  - CTO/NYISO may request remote disconnection of a CLLC or a CLLGC to avoid injections/withdrawals beyond applicable limits

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Resolving Large Load Impacts on Resource Adequacy

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Resolving Large Load RA Impacts

- Large Loads can mitigate any adverse impacts they have on Resource Adequacy and be deemed eligible to receive some amount of Firm Withdrawal Service by pairing with new ICAP Supply, via a:
  - Co-Located Arrangement with an Associated Resource(s), or
  - Partner Resource Arrangement with an Associated Resource(s)
- A Large Load's eligibility to receive any FWS through the LLIP by entering into a Co-Located/Partner Resource Arrangement is contingent on the Associated Resource's continued participation in the ICAP market

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Co-Located and Partner Resource Arrangements - Terms

- All Associated Resource(s) that are party to a Co-Located/Partner Resource Arrangement must certify a Large Load Bilateral Transaction with the associated Large Load in each Obligation Procurement Period
  - The Large Load Bilateral Transaction is a Capacity Bilateral
- Co-Located/Partner Resource Arrangements will have a required duration of 15-years
  - Premature exit from the ICAP market by the Associated Resource due to an IIFO, Mothball, or Retirement may result in the associated Large Load losing some or all of its FWS rights
- After the 15-year term expires, the Arrangement will be dissolved and the Large Load's FWS award will become permanent

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Partnering with DER Aggregations and Demand Side Resources

- **Large Loads will be able to enter into Partner Resource Arrangements with Aggregations and Demand Side Resources**
  - The DER Facilities comprising the Aggregation/the Demand Side Resource must not have previously participated in the NYISO markets
  - The makeup of an Aggregation acting as an Associated Resource to a Large Load will be locked for the duration of the 15-year Partner Resource Arrangement
- **A Large Load that is receiving FWS through a Co-Located/Partner Resource Arrangement is ineligible to itself qualify as an Associated Resource**

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Co-Located and Limited Load Configuration (CLLC) Participation Model

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Co-Located and Limited Load Configuration (CLLC)

- **The new CLLC participation model will serve as the sole method of market participation for Limited Withdrawal Service Loads**
  - The CLLC model is a single unified ruleset that can support the market participation of Limited Withdrawal Service Loads in both standalone and co-located configurations
- **Specifically, the following would participate under the CLLC model:**
  - A standalone Limited Withdrawal Service Load, or
    - A Large Load taking NFWS, or a PFWS Load
  - A Limited Withdrawal Service Load that co-locates with Co-Located Resources

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CLLC Eligibility

- **A CLLC must contain some amount of Limited Withdrawal Service Load**
  - NFWS Load and/or ZWS Load
- **A CLLC may also contain one or more:**
  - Co-Located Resources, provided however that Resources utilizing other participation models (e.g. ESR, HSR, CSR, DER) cannot also participate as part of a CLLC
- **All components of a CLLC:**
  - Must be physically co-located behind a single Point of Interconnection
  - Will be modeled as a single Resource with a single PTID
  - Participate in the Energy, Ancillary Service, and Capacity markets as a single Resource, like DER Aggregations
- **The CLLC participation model is a dispatch-only model**
  - CLLCs will not be able to make use of biddable commitment parameters, and must be capable of following 5-minute basepoints throughout Real-Time

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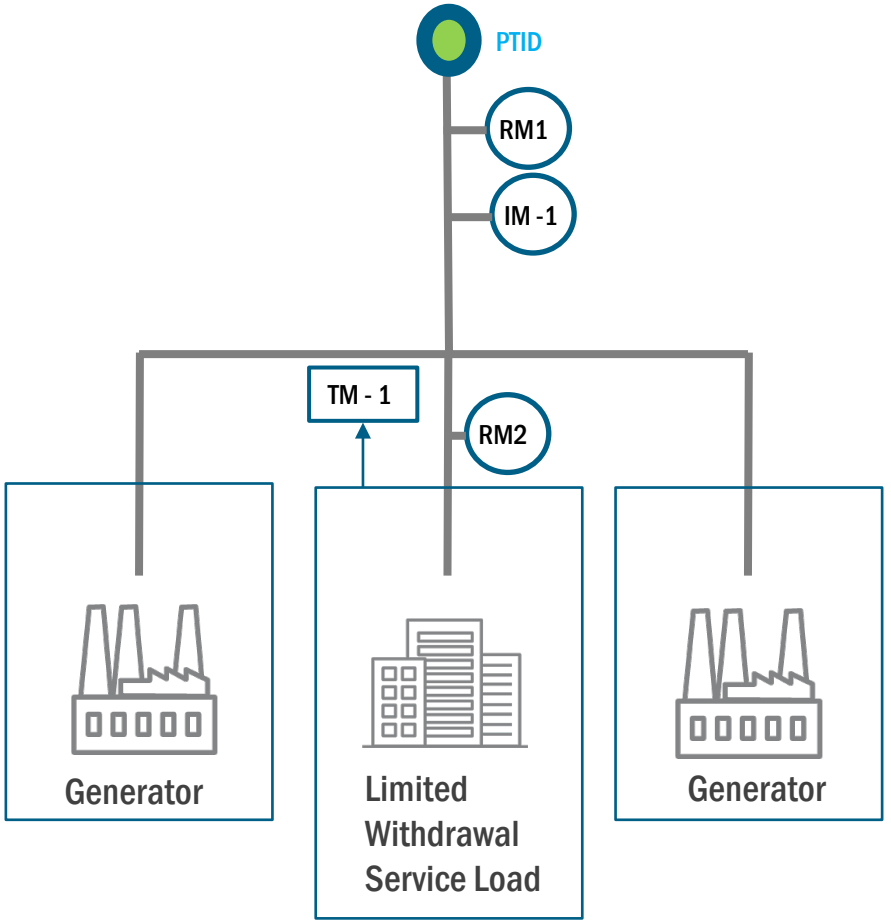
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CLLC Metering and Telemetry Requirements

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CLLC Metering

Meter Designation	Meter Requirements	Data flows
RM1	Revenue grade; dual – channel meter; reported by a Meter Authority	Hourly data of CLLC
RM2	Revenue grade; reported by a Meter Authority	Hourly data on Large Load
IM -1	Instantaneous meter	6 second aggregated output telemetry from CLLC
TM -1	SCADA data	6 second aggregated output telemetry from Large Load (equiv. AC)



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CLLC Interconnection Rules

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CLLC CRIS

- **The sum of requested CRIS across all Co-Located Resources contained within a CLLC must not exceed the lesser of:**
  - The CLLC's Point of Injection Limit
  - The sum of the Co-Located Resources' Injection capabilities

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CLLC ERIS

- **The requested ERIS for each Co-Located Resource comprising a CLLC cannot exceed the lesser of:**
  - The CLLC's Point of Injection Limit plus the Gross peak MW load requested by the Co-Located Load comprising the CLLC or
  - The relevant Co-Located Resource's nameplate
- **The sum of ERIS awarded across all Co-Located Resources within a CLLC may exceed the CLLC's POI Limit**
  - However, actual energy injections at the POI will be limited by the CLLC's POI Limit
- **Co-Located Resources within a CLLC may request ERIS below the nameplate of said Co-Located Resource**

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CLLC Capacity Market Rules

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CLLC - Capacity Market Participation

- **The Co-Located Resources within a CLLC will, together qualify as a single ICAP Supplier called a Composite Co-Located Resource**
  - The Composite Co-Located Resource's ICAP market parameters will be calculated/determined collectively This includes DMNC values, ICAP/UCAP values, etc.
- **Composite Co-Located Resources will be required to have a 24-hour duration**
- **Additionally, any portion of the Co-Located Load within a CLLC that is taking FWS will be included in the Load forecasts that factor into the IRM and LCRs, and will contribute to its LSE's ICAP obligation**
  - The ICAP obligation of the FWS Load will not exceed the POW Limit of the CLLC multiplied by the IRM
  - The FWS Load's ICAP obligation has no bearing on the ICAP market parameters of the CLLC
  - If a CLLC's Composite Co-Located Resource is in a Co-Located Arrangement with the CLLC's Co-Located Load, then the CLLC will need to certify a self-supply Large Load Bilateral Transaction

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CLLC – DMNC/ICAP/UCAP

- Composite Co-Located Resources will perform a single joint DMNC test, the results of which will be measured at the POI meter and may reflect Co-Located Load flexibility
- Composite Co-Located Resources will receive a single ICAP/UCAP value
  - A Composite Co-Located Resource's ICAP award will not exceed the lesser of:
    - The Composite Co-Located Resource's total CRIS award
    - The Composite Co-Located Resource's DMNC value
- CLLCs are 24-hour Resources and will therefore receive a 24-hour CAF

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CLLC - Bid/Schedule/Notify (BSN) Obligations

- **CLLCs will be required to schedule a bilateral, notify the ISO of any outages, or comply with a bidding obligation that is calculated as follows:**

$$= ICAP\ Sold - \max(0, \min(|LOL|, FWS\ MW)$$

  - The CLLC must bid the ICAP sold by its Composite Co-Located Resource minus the larger of a) zero and b) the minimum of i) the ICAP MW of the FWS Load MW associated with the CLLC and ii) the absolute value of the CLLC's LOL for the given hour

- **Composite Co-Located Resources will report outages collectively**
  - The individual Co-Located Resources comprising a CLLC/Composite Co-Located Resource will not be required to submit outages to the NYISO

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CLLC Energy Market Rules

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CLLC – Energy Market Participation

- **A CLLC, inclusive of all Co-Located Resource(s) and Co-Located Load contained therein, participate in the Energy markets as a single Resource**
  - CLLCs will submit a single Energy bid that represents the CLLC's willingness to pay/be paid for Energy across it's entire Operating Range
    - A single CLLC bid may range from a negative LOL (net withdrawals) to a positive UOL (net supply)
  - CLLCs will receive a single net Energy schedule from the NYISO, which could instruct the CLLC to net withdraw or net inject depending on it's bids and the CLLC's composition
- **CLLCs may nominate up to three separate ramp rates in their bids**

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CLLC - Energy Market Bidding Proposal

- **CLLCs will utilize an 11-point incremental Energy bid curve**
  CLLCs will be able to bid in both the DAM and RTM
- **CLLCs may offer using the following bid modes:**
  - Self-Committed Fixed
  - Self-Committed Flex
  - ISO-Committed Flex
- **CLLC Energy bids will have a minimum size of 1MW**
  - CLLCs may submit bids in increments of 100kW beyond the 1MW minimum

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CLLC - Non-Firm Withdrawal Service Bid Cap

- **Any segment of a CLLC's Energy bid that represents Energy withdrawals being taken under Non-Firm Withdrawal Service will be subject to the NFWS bid cap of $200/MWh**
  - The $200/MWh bid cap helps to ensure that NFWS Load MW are curtailed in advance of significant transmission security and/or resource adequacy shortage events

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CLLC - Derates and Outages

- **Like DER Aggregations and HSRs, CLLCs will be able to derate their UOL and LOL after HAM close using the Grid Operation Coordination Portal (GOCP)**
  - The GOCP should be used to update the CLLC's UOL and LOL as necessary to reflect changing operational conditions throughout Real-Time (i.e. inaccurate Load forecasts, IPR forecast deviations, etc.)
  - Use of the GOCP does not preclude a CLLC from being subject to balancing Energy settlements if it is unable to meet its DAM Energy schedule because of changes to it's UOL/LOL in Real-Time

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CLLC Settlement Rules

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CLLC Energy Market Settlements

- **A CLLC will receive a single net Energy settlement from the calculated using net flows measured at the CLLC's net meter**
  - All net Energy Withdrawals measured at the CLLC's POI net meter will be settled as Load, using the Zonal LBMP
  - All net Energy Supply measured at the CLLC's POI net meter will be settled as wholesale Energy Injections, using the CLLC's nodal LBMP
- **A CLLC's balancing Energy settlement could involve buying out of a DAM Load position and buying into an RTM Supply position, or vice versa**
  - For example, if a CLLC is scheduled for 20MW of net Withdrawals in the DAM, but re-dispatched for Energy in the RTM, the CLLC would need to buy out of its DAM position at the RTM Zonal LBMP and be compensated for an RTM Energy supply position at the RTM nodal LBMP
- **CLLC Energy/Congestion/Losses will be settled based on flows (MWh) at the POI (i.e., net of behind-the-meter generation)**

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Make Whole Payments/Station Power

- CLLCs will be broadly excluded from make whole payment (DAM/RTM BPCG, DAMAP, etc.) eligibility on both the supply and withdrawal side of their operating range
- CLLCs will be ineligible for Station Power

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Deviation Penalties for CLLCs

- **A new CLLC deviation penalty will be assessed to CLLCs that do not follow the NYISO's dispatch instructions when net withdrawing from the system**
  - The penalty will have a tolerance threshold of 5% of the CLLC's maximum registered withdrawal limit (i.e., FWS plus NFWS).
  - The penalty will be assessed using the Regulation clearing price, consistent with existing under/overperformance penalties for Generators
  - Loads taking only Firm Withdrawal Service are not subject to this charge
- **CLLCs will be subject to the DER Aggregation Overgeneration/Undergeneration penalty structure when net injecting**

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CLLC Out-of-Merits

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CLLC Out-of-Merits

- **NYISO sees a need to supplement the NFWS bid cap with OOM capability**
  - CLLCs will therefore be subject to OOM obligations reminiscent of those applicable to Generators
  - CLLCs will be required to timely respond to ISO/TO OOMs
  - CLLCs may also request to be OOM'ed through the TO consistent with its Withdrawal Service classification and/or the capabilities of the Co-Located Resources contained therein

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Large Loads and Local Generators

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Large Loads and Local Generators

- **A Large Load may elect to interconnect as a Co-Located Local Load, which is a Large Load that is entirely served, behind-the-meter, by a Co-Located Local Generator**
  - A Co-Located Local Load will have no Withdrawal Service rights, and will not be allowed to withdraw from the system
  - A Co-Located Local Generator exists only to serve a Co-Located Local Load behind-the-meter and will therefore not have any injection rights
    - Specifically, the Co-Located Local Generator will not need ERIS/CRIS to serve its Co-Located Local Load and therefore does not need to have proceeded through the cluster study prior to activation
- **A Co-Located Local Load that is interconnected to the transmission system will still be subject to Large Load cost allocation and the SRBF**

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DER Modeling Improvements and Baseline Enhancements

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DER Modeling Improvements

- **Demand Side Resources whose Demand Response capability exceeds 20MW shall be prohibited from aggregating with other DER Facilities**
  - Additionally, these large Demand Side Resources will be modeled with a dedicated, unique PTID
- **These changes are necessary to provide necessary visibility into large DSR activity and will support real-time grid operations**

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Dispatchable DSR Baseline Enhancements

- **NYISO proposes to require DSRs participating in the DER Participation Model to use "Meter Before/Meter After" baselining to measure response provided in the first hour of DSR dispatch**
  - This will enhance accuracy of the actual load reduction measurement
- **After the first hour of dispatch, Aggregators will calculate a new baseline using the current ECBL methodology**
  - ECBL will be used to measure DSR Demand Response for all subsequent intervals in the dispatch
  - MB/MA baselining will be used to measure response again after the passing of one hour in which the DSR did not receive dispatch instructions from the NYISO

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Buyer Side Mitigation

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Buyer-Side Mitigation Exclusion for Co-Located/Partnered Generation

- **The NYISO is proposing that new Generation supply that enters into a Co-Located or Partner Resource Arrangement with a Large Load be excluded from Buyer-Side Mitigation examination**
  - The intention of the supply being added is to offset the Resource Adequacy impact created by the large load
  - Consistent with other exclusions, NYISO will monitor whether the exclusion continues to serve its intended purpose and whether concerns regarding an exercise of market power arise
- **Due to the development timelines expected for Large Loads being much shorter in comparison to Generation, and the low likelihood that this construct would be an effective mechanism for price suppression, NYISO proposes that Generation that receives an exclusion for Co-Location/Partnership with Large Load will not have that exclusion retracted/rescinded**
  - Consistent with other exclusions, NYISO will monitor whether the exclusion continues to serve its intended purpose and whether concerns regarding an exercise of market power arise

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Buyer-Side Mitigation

Proposed Exclusion

If the NYISO determines that there is a reliability need in the RNA or STAR, then any proposed supply-side solution responding to a resulting solicitation found to be Viable and Sufficient in satisfying that Reliability Need (whether a market-based solution or a regulated solution) would be excluded from review under the BSM provisions.

- **Why BSM exclusion is warranted**
  - The solicitation is initiated to address an identified Reliability Need, and the solution must be found Viable and Sufficient to address that need.
  - Entry is therefore tied to resolving a specific reliability need, not to uneconomic entry intended to suppress capacity prices.
  - A reliability solicitation is not an effective means to exercise buyer-side market power.

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Next Steps

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Next Steps

- **November 2026**
  - 11/16 Section 205 Filing

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Proposed Effective Dates

- **February 1, 2027**
  - Requested effective date for the new Attachment LL, new Part 3A of the OATT, and certain other MST and OATT revisions
  - BTM:NG Resource Sunset
    - NYISO will stop accepting new BTM:NG Resource Interconnection Requests
    - NYISO will stop accepting new registration submissions for participation in the NYISO markets as a BTM:NG Resource
- **June 1, 2028**
  - Requested effective date for the market participation related tariff revisions
- **May 1, 2029**
  - NYISO will sunset the BTM:NG Resource program

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Effective Dates - Attachment LL

- Proposed effective date of February 1, 2027
- Requested effective date will allow for load interconnection procedures under Section 3.9 of ISO OATT to remain in effect through the comment period
- Pre-app process will become effective February 1, 2027

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Questions?

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Our Mission & Vision

Mission

Ensure power system reliability and competitive markets for New York in a clean energy future

Vision

Working together with stakeholders to build the cleanest, most reliable electric system in the nation

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Appendix

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Tariff Defined Terms

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Key Definitions

- **Large Load**
  - Large Load shall mean a commercial or industrial load located at a single site or in close proximity, behind one or more Points of Interconnection, that has a peak Load of 50 MW or greater connected to the New York State Transmission System, which is subject to and has completed the applicable requirements of the Large Load Integration Procedures in Attachment LL of the ISO OATT. For purposes of this definition, Load shall be considered to be located “in close proximity” if it: (i) is located within 2 miles and 2 electrical buses and (ii) is located in the same Capacity Region

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Review of Tariff Defined Terms

- **Associated Resource**
  - A Co-Located Resource or Partner Resource that may mitigate some or all of a Large Load's adverse impacts to resource adequacy and/or transmission security identified in the LLIP set forth in Attachment LL of the ISO OATT, which allows the respective Co-Located Load or Large Load to take some amount of Firm Withdrawal Service.
- **Large Load Bilateral Transaction**
  - A Transaction between a Large Load and its Associated Resource(s) for the purchase and/or sale of Capacity for the UCAP equivalent of ICAP MW documented in the applicable Large Load Integration Request that is necessary to allow the Large Load to take some amount of Firm Withdrawal Service.

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Review of Tariff Defined Terms

- **Co-Located Load:**
  - A Large Load connected behind the same Point of Interconnection as a Co-Located Resource.
- **Co-Located Resource:**
  - A Resource connected behind the same Point of Interconnection as a Co-Located Load. Co-Located Resources cannot participate in the ISO Administered Markets under any of the following participation models: CSR, HSR, DER and Aggregation, and SCR/EDRP models. The following are not Co-Located Resources: MW of Unforced Capacity associated with a UDR or EDR rights holder and Co-Located Local Generators.
- **Co-Located Arrangement:**
  - An agreement between a Co-Located Load and a Co-Located Resource(s) for the purpose of enabling the Co-Located Load to take some amount of Firm Withdrawal Service. The Co-Located Resource(s) and the associated Co-Located Load must be behind the same Point of Interconnection and must jointly submit an attestation in accordance with Section 44.6.3.5 of Attachment LL of the ISO OATT. The Co-Located Arrangement shall have a required duration of fifteen (15) years, starting the first day of the Obligation Procurement Period for which the UCAP equivalent of ICAP documented in the Large Load Bilateral Transaction is initially certified, in accordance with Services Tariff Sections 5.11.2 and 5.13.1 and ISO Procedures.

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Review of Tariff Defined Terms

- **Partner Resource:**
  - A Resource that has been identified by an Eligible Customer, and confirmed by the Resource developer, to be associated with a Large Load, which is electrically located in the same Capacity Region, that may mitigate some or all of its adverse impacts to resource adequacy and/or transmission security identified in the LLIP set forth in Attachment LL of the ISO OATT and is not connected to the same Point of Interconnection as the Large Load in the applicable Partner Resource Arrangement. A Large Load taking Firm Withdrawal Service that is a party to a Partner Resource Arrangement and that registers as a Demand Side Resource cannot serve as the Partner Resource to another Large Load.
- **Partner Resource Arrangement:**
  - An agreement between Partner Resource(s) and a Large Load that are electrically located in the same Capacity Region for the purpose of enabling the Large Load to take Firm Withdrawal Service. The Partner Resource(s) and the Large Load must jointly submit an attestation in accordance with Section 44.6.3.5 of Attachment LL of the ISO OATT. The Partner Resource Arrangement shall have a required duration of fifteen (15) years, starting the first day of the Obligation Procurement Period for which the UCAP equivalent of ICAP documented in the applicable Large Load Bilateral Transaction is initially certified, in accordance with Services Tariff Sections 5.11.2 and 5.13.1 and ISO Procedures.

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Review of Tariff Defined Terms

- **Limited Withdrawal Service Load:**
  - A Large Load taking any amount of Non-Firm Withdrawal Service and/or is a Zero Withdrawal Service Load.
- **Zero Withdrawal Service Load:**
  - A Large Load or portion thereof that is not authorized under the ISO OATT to withdraw Energy from the NYS Transmission System.. A Zero Withdrawal Service Load is either (a) a Limited Withdrawal Service Load in a CLLC or (b) a Co-Located Local Load in a CLGC. Energy consumption by Zero Withdrawal Service Loads shall be metered and included in Gross Load.

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Review of Tariff Defined Terms

- **Co-Located and Limited Load Configuration ("CLLC"):**
  - A configuration that consists of (a) a Co-Located Load that is a Limited Withdrawal Service Load participating with one or more Co-Located Resources, in accordance with Section 4.1.12 of the Services Tariff, or (b) a stand-alone Limited Withdrawal Service Load . All components of the CLLC must be located behind a single Point of Interconnection. A Large Load taking only Firm Withdrawal Service may not participate in a CLLC. A Co-Located Resource(s) participating in a CLLC may not participate in the ISO Administered Markets through any other participation model.
  - The CLLC shall participate in the ISO-administered Energy and Ancillary Services markets as a single Resource that is capable of following the ISO's dispatch instructions. In order to qualify for wholesale market participation, a CLLC must be able to inject or withdraw at least 1 MW of Energy to/from the transmission system. A CLLC will be required to submit Energy Bids consistent with the Withdrawal Service(s) being taken by the Co-Located Load and the manner in which the Market Participant seeks to exercise those withdrawal service rights within a given real-time market interval. The Co-Located Resource(s) in a CLLC shall participate in the ISO-administered Installed Capacity market as a single ICAP Supplier referred to as a Composite Co-Located Resource.
- **Composite Co-Located Resource:**
  - One or more Co-Located Resource(s) within a CLLC that participate in the ISO-administered Installed Capacity market as a single Installed Capacity Supplier.

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Review of Tariff Defined Terms

- **Co-Located Local Load:**
  - A Zero Withdrawal Service Load that is served solely by Co-Located Local Generator(s) behind the same Point of Interconnection that is synchronized to the NYS Transmission System. A Zero Withdrawal Service Load taking any amount of Non-Firm Withdrawal Service is not a Co-Located Local Load; it is a Limited Withdrawal Service Load.
- **Co-Located Local Generator:**
  - A Generator serving a Co-Located Local Load behind the same Point of Interconnection that (a) is synchronized to the NYS Transmission System; (b) supplies Energy solely to the Co-Located Local Load; and (c) has not obtained ERIS pursuant to the terms of the ISO OATT.
- **Co-Located Local Generator Configuration ("CLGC"):**
  - A configuration in which a Co-Located Local Load is served solely by a Co-Located Local Generator(s).

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LLIP Process

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Large Loads & Partner Resources

- **A Large Load may identify one or more Partner Resources**
  - Partner Resources may mitigate some or all adverse impacts observed in Resource Adequacy Evaluation
  - Partner Resources must be electrically located in the same Capacity Region as the Large Load
  - Partnered Resources must complete the interconnection process and obtain CRIS
  - Partner Resources must be proposed projects that do not yet meet the inclusion rules in the Reliability Planning Process
  - Partner Resources must attest to their intent to be a Partner Resource with a Large Load project once identified by the Large Load at any of the following points:
    - Large Load Integration Request
    - ALI Entry Decision
    - Through a modification request

Capacity Region	Zones
Rest of State	A-F
Lower Hudson Valley	G-I
New York City	J
Long Island	K

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Co-Located Large Load & Associated Generator

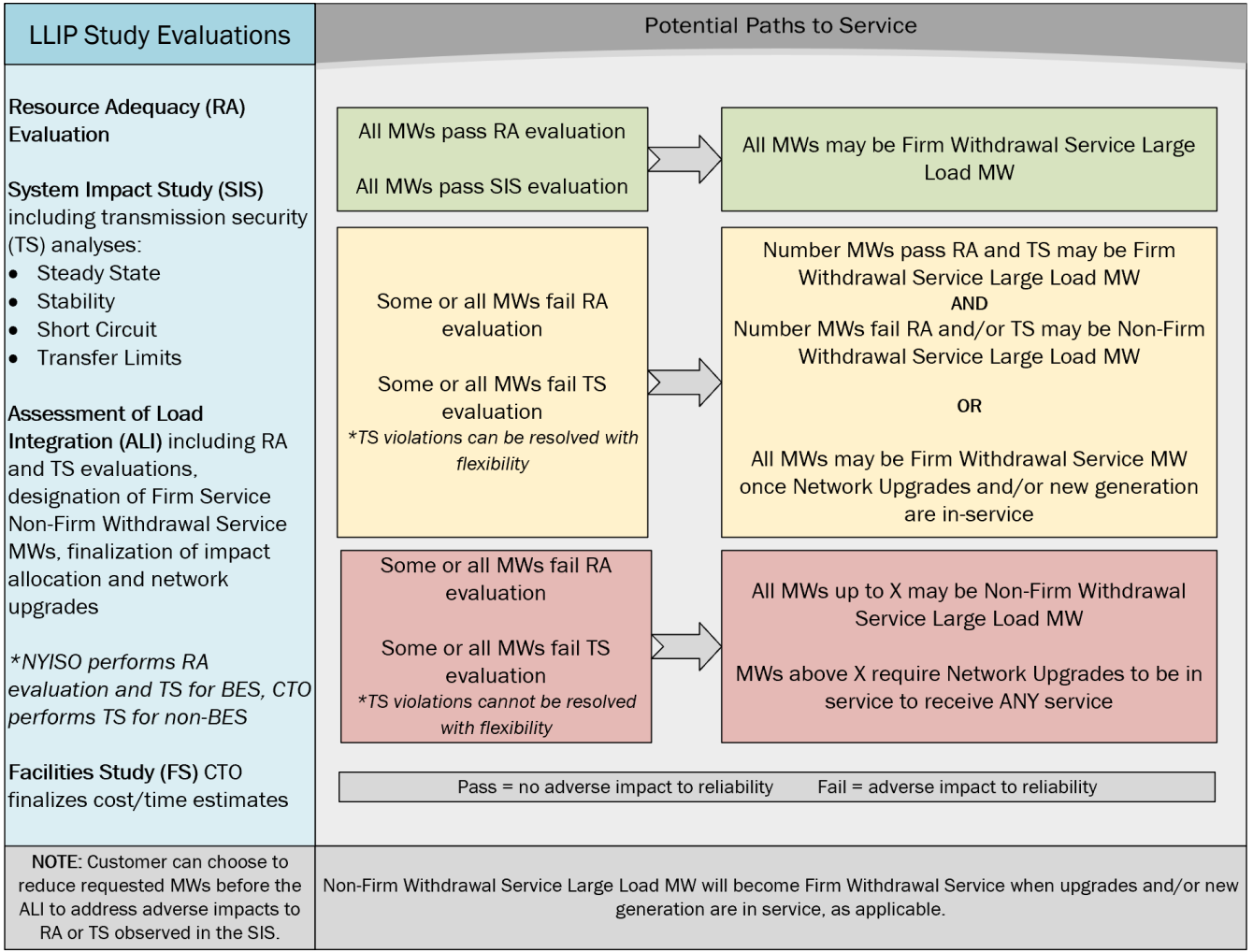
- Co-located Large Load and Associated Generator will be studied for their maximum requested withdrawal amount in the LLIP study
- Eligible Customers must indicate the requested injection and withdrawal limits and appropriate control mechanisms to effectuate those limits
- Associated Generators not seeking ERIS and/or CRIS and not seeking MW injection on to the system may be eligible to bypass the Cluster Study Process
  - Associated Generators seeking ERIS/CRIS must complete Cluster Study to receive ERIS/CRIS
- Co-located Large Load & Associated Generator will be studied as part of the Resource Adequacy Evaluation and provided an allocation of Firm and Non-Firm Withdrawal Service amounts up to the requested withdrawal amount of the integration request
  - The Large Load can integrate taking Non-Firm Withdrawal Service during the time prior to the Generator's commencement of participation in the ICAP market (assuming there are no Transmission Security violations that require upgrades or the required upgrades are in service)
  - Associated Generators must seek ERIS/CRIS through the Cluster Study in order for the Co-located Large Load to receive Firm Withdrawal Service

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LLIP Outcomes

- Examples of paths to service in the following slides



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Adverse Reliability Impacts and Potential Paths to Service

- **Examples of adverse reliability impacts that <u>could</u> be resolved by taking Non-Firm Withdrawal Service**
  - ❑ Adverse resource adequacy impact
  - ❑ Thermal overloads on transmission elements that are ISO-secured or are eligible to be ISO-secured
  - ❑ Thermal transfer degradation (if the limiting element is an ISO-secured facility)

These violations can be addressed by, for example, adding new supply (Associated Resources), taking Non-Firm Withdrawal Service, reducing the project size, or building the necessary Network Upgrades.

- **Examples of adverse reliability impacts that <u>cannot</u> be resolved by taking Non-Firm Withdrawal Service**
  - ❑ Thermal overloads on transmission lines that are not ISO-secured
  - ❑ High- or low-voltage violations
  - ❑ Stability violations (undamped, oscillations, first-swing instability)
  - ❑ Voltage transfer degradation
  - ❑ Stability transfer degradation
  - ❑ Overdutied circuit breakers

These violations can be addressed by, for example, reducing the project size or building the necessary network upgrades.

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Adverse Reliability Impacts and Potential Paths to Service

- **Considering the outcome of the RA evaluation and TS analyses (including the type of TS violation) in the SIS, an Eligible Customer may choose a combination of "solutions" to address adverse impacts**
  - "Solutions" may include associating with additional resources, accepting NFWS, reducing in project size, and/or Network Upgrades
    - Note: SIS/ALI study will not determine the MW size of the project required to eliminate the need for a Network Upgrade for violations such as voltage, stability, and short-circuit. In other words, the SIS/ALI studies will not "right-size" the projects for such violations.
  - The chosen combination of "solutions" will be evaluated in the ALI
- **Examples that illustrate potential combinations that could resolve a set of adverse impacts are provided in the appendix**

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Large Load Pre-Application

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Pre-Application Process

- NYISO proposes to include an optional Pre-Application process to provide greater information access to potential Eligible Customers
- Any requester (whether in the interconnection queue or not) can submit a request using the Pre-Application Request form
  - $5,000 per Point of Interconnection
    - 25% allocated to NYISO
    - 75% allocated to Connecting TO/Affected TOs
  - Pre-Application Requests can be submitted on a rolling basis at any time

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Pre-Application Process, cont.

- **NYISO will route the Pre-Application Request to the applicable Connecting Transmission Owner (CTO), CTO will confirm within 5 Business Days and subsequently schedule a scoping meeting**
  - CTO will provide the Pre-Application Report within 25 Business Days of the scoping meeting
- **Information available in a Pre-Application Report**
  - Confirmation that the proposed POI is part of the NYSTS, POI line/substation name, ID, bus numbers and circuit IDs, line lengths, voltage, ratings (normal, LTE and STE), terminal end stations
  - Additional Information* (e.g., description of potential new substation bus configuration (not a conceptual one-line diagram), transmission constraints, planned transmission upgrades, parallel lines, breaker rating, available breaker positions, existing/known constraints known physical feasibility issues)
  - *To the extent readily available data exists

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Large Load Integration Request

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Large Load Integration Request Overview

- **Large Load Integration Requests are permitted anytime**
- **Large Load projects with validated Large Load Integration Requests and executed Large Load Study Integration Study Agreement will be included in the next available LLIP study**
  - Large Load Integration Requests submitted within 30 Business Days of an upcoming RAMP are at risk for not entering the next available LLIP cycle

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Large Load Integration Request Overview

- **Projects alternatives that are mutually exclusive will not be evaluated**
  - Each project must identify:
    - A single proposal for one or more POIs
    - A single proposal for project size
    - A single proposal for project type – if the project is comprised of multiple project types, describes all project types
      - Once the Large Load Integration Request is validated, modifying the project POI, size, or type(s) will be subject to the load modification process
- **Integration Requests for uprates to proposed Large Loads may be submitted to be studied in the same Group or in a subsequent Group**

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Large Load Integration Request - Validation

- **Validation on a rolling basis for Large Load Integration Requests**
- **Step 1: Within 5 Business Days of receipt of Large Load Integration Request**
  - NYISO reviews Large Load Integration Request to identify the CTO and ATOs/Affected Systems
  - NYISO notifies the identified CTO and ATOs/Affected Systems it is aware of via Interconnection Projects Portal
  - CTO confirms (via Interconnection Projects Portal) it is the CTO and confirms ATOs/Affected Systems
  - NYISO confirms receipt of payment of Application Fee and Study Deposit 1
- **Step 2: Within 15 Business Days of completion of Step 1**
  - NYISO reviews Large Load Modeling form
  - NYISO reviews models (i.e., confirms it is a workable model)
  - NYISO performs a screening for site control
  - NYISO notifies Eligible Customer that the Large Load Integration Request is valid or identifies deficiencies

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Large Load Integration Request - Deficiencies

- An Eligible Customer must cure Large Load Integration Request deficiencies to have a validated request and proceed to the next available LLIP study
- Eligible Customers will have opportunities to cure deficiencies
  - Eligible Customers are afforded 10 Business Days to submit cure attempts
    - Failure to cure an Large Load Integration Request deficiency within the allotted time will result in withdrawal
  - NYISO is afforded 10 Business Days to review submittals to cure deficiencies
- Eligible Customers must address all identified deficiencies in their cure attempt

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Large Load Integration Request Requirements

1. Non-refundable Application Fee (cash only)
2. Study Deposit 1 (cash, letter of credit, and/or surety bond)
3. Readiness Deposit (cash, letter of credit, and/or surety bond)
4. Completed Large Load Modeling form including
    - Description of the Large Load Project
    - Operational characteristics
    - Information regarding Co-Located and/or Partner Resources
        - If Partner Resource is identified, Associated Resource attestation is required

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Large Load Integration Request Requirements, cont.

5. **Conceptual one-line diagram that includes:**
    - The Project name, and the Interconnection Customer name on the diagram;
    - The facility address (specific location – coordinates or closest street address);
    - Configuration of the facility;
    - The facility's electrical components (i.e., generation, transformers (GSU, PSU, current transformer, and potential transformers), breakers, switches, cables/lines/feeders, compensation, FACTs, auxiliary load, buses, etc.) as described in the modeling data form;
    - The capability and voltage levels of the electrical components, their connection to each other and to the New York State Transmission System;
    - The Point of Interconnection (name of the substation (specify the bus) or transmission/distribution line name and number);
    - References to other diagram sheets if there is more than one diagram sheet (i.e., use references to indicate how the diagrams are interconnected).

* Acronyms used in the conceptual breaker one-line diagram should follow ANSI Standard Device Numbers & Common Acronyms

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Large Load Integration Request Requirements, cont.

6. **Project layout diagram that shows the general project layout and location of project in relation to proposed POI, including the specific POI(s)**
   - Must indicate voltage level, address, coordinates, location in relation to facility
   - Interconnection Customer does not need to specify breaker position in a substation
7. **Demonstration of site control**
8. **Workable individual project models (e.g., short circuit, steady-state, and stability)**

***Additional technical data may be required from Interconnection Customers at later stages.**

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Large Load Integration Request – Site Control

- **Site control will be used as an additional readiness requirement for Large Loads to enter a LLIP study**
- **A site control screening will be performed by NYISO as part of the Large Load Integration Request validation**
- **General Submission Requirements**
  - Eligible Customer must provide documentation that demonstrates the rights to develop the specific proposed Large Load project
  - The party's name listed on the documentation to demonstrate site control should match the name of the Eligible Customer on record with NYISO
    - In situations where the name differs, the Eligible Customer is responsible for providing additional documentation explaining the corporate relationship such as, an SEC filing, document on file with the applicable secretary of state, other official corporate document, or a purchase sale agreement.
  - Eligible Customer must provide detailed site plan and equipment layout detailing the conceptual design of the proposed facility and how it is situated within the area that is covered by the Site Control and available for the Eligible Customer's use, as well as any wetlands, unusable land, spacing, setbacks, etc.

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Fees, Study Deposits, and Study Costs

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Application Fee

- **Non-refundable Application Fee submitted with Large Load Integration Request : $10,000 (in cash)**
  - 75% allocated to NYISO and 25% to CTO/ATOs

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Study Deposits

- **Study Deposit 1 based on size of project submitted with Large Load Request:**
  - Less than 200 MW* $100,000
  - Less than 500 MW & greater than or equal to 200 MW $150,000
  - Greater than or equal to 500 MW $200,000
- **Study Deposit 2 based on size of project submitted with ALI Entry Decision:**
  - Less than 200 MW* Study deposit 1 + $100,000 (total $200,000)
  - Less than 500 MW & greater than or equal to 200 MW Study deposit 1 + $100,000 (total $250,000)
  - Greater than or equal to 500 MW Study deposit 1 + $100,000 (total $300,000)
- **Study Deposits can be submitted as cash, a letter of credit, and/or a surety bond**
  - Letter of credit and surety bond are subject to NYISO tariff requirements in MST Sections 26.6.1.2 and 26.6.1.3

*Including incremental increases to a project less than 50 MW & greater than or equal to 10 MW as submitted in a Modification Request

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Readiness Deposits

- **To further reduce the likelihood of speculative projects, a readiness deposit framework is proposed**
  - $4,000/MW to be collected at the ALI Entry Decision for projects that elect to continue in the LLIP
  - Deposit to be held by NYISO until the customer accepts cost allocation with the applicable TOs or is withdrawn
  - Deposit will be refunded if the project accepts cost allocation or is withdrawn, and there are no unpaid invoices

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Invoicing

- **The NYISO will invoice Eligible Customers actual study costs on a monthly basis**
  - Failure to timely pay a monthly invoice will result in withdrawal of the project from the interconnection queue and will be assessed interest on any unpaid invoiced amounts calculated in accordance with section 35.19a(a)(2) of FERC's regulations
  - NYISO will not draw on the study deposit to cover unpaid monthly invoices of the project; however, NYISO will use the study deposit to cover the unpaid balance, if any, when NYISO reconciles the final invoice when either the study is completed or the project is withdrawn from the interconnection queue
- **Study Deposits will remain in place for duration of the LLIP Study**

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LLIP Study Overview

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LLIP Study Base Cases

LLIP Study Component	Base System Representation
LLIP-1 (RAMP begins Q3 2027)	
RAMP/SIS	2027 Q3 STAR
ALI	2028 Q1 STAR
LLIP-2 (RAMP begins Q1 2028)	
RAMP/SIS	2028 Q1 STAR
ALI	2028 Q3 STAR

- **Base case updates compared to base system representation:**
  - RAMP/SIS: None*
    - *Select sensitivities may be included to evaluate the impact of nearby load projects not modeled at their full requested MW in the STAR base case
  - ALI:
    - Inclusion of Large Loads evaluated in previous LLIP cycles (and associated Network Upgrades) and as identified by the TO
    - Update nearby load projects to withdraw their full requested MW

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Modeling of Associated Resource(s) in LLIP Study

- **Co-Located Resource(s)**
  - Resource adequacy – included with injection and withdrawal limits modeled
  - Transmission security – included with withdrawal limit of facility modeled (outage of Resource(s) included as design contingency)
    - Examples showing Co-Located facilities included in appendix
- **Partnered Resource(s)**
  - Resource adequacy – included
  - Transmission security – not included*

*unless NYISO in its engineering judgement determines that the resource may resolve a violation

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Resource Adequacy and Modeling Period (RAMP)

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RAMP: Part 1

- **NYISO: Performs a resource adequacy evaluation for each project**
  - Determine the adverse impact of the Large Load project and associated resources, if any, on NYCA resource adequacy
  - RA evaluation result is shared with the Eligible Customer
- **CTO: Performs a preliminary physical infeasibility screening and determines preliminary attachment facilities**
  - System diagrams depicting the proposed POI of the Large Load project provided to NYISO
  - Contingency definitions are provided to the NYISO
  - Physical infeasibility screening results are shared with the Eligible Customer through the Interconnection Projects Portal
- **NYISO: Builds preliminary study package (including cases and auxiliary files for steady-state, stability, short-circuit, and transfer limit analyses) using the year 5 system representation from the current STAR as the base case**
- **CTO: Reviews preliminary study package**
- **NYISO: Performs supplemental pre-project analyses**

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SIS Entry Decision

- **The Eligible Customer will have 7 calendar days from receiving the Screening results to decide whether they will enter the System Impact Study**
  - If yes, the Eligible Customer may provide limited allowable project modifications
    - Project size reduction
    - Change in POI as informed by the physical infeasibility screening performed by the CTO
  - If no, the project will be withdrawn
    - Failure to respond in a timely manner will be considered a withdrawal
- **The Eligible Customer will make their elections in the Interconnection Projects Portal**

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SIS Scope

- **Following the SIS Entry Decision, NYISO will draft the SIS scope and provide the scope to the impacted CTOs and ATOs for review**
  - Select sensitivities may be included to evaluate the impact of nearby load projects not modeled at their full requested MW in the STAR base case
- **NYISO will provide notification to stakeholders within 5 Business Days of SIS commencement**
  - SIS Scope
  - List of projects that elected to enter the SIS with key project information

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RAMP: Part 2

- NYISO: Revises the study package to reflect SIS Entry elections
- CTO/ATO/Affected Systems: Reviews study package
- NYISO: Finalizes and distributes study package to all impacted TOs, and commences the SIS

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Resource Adequacy Evaluation

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Resource Adequacy Impact Requirement

- **Large Loads subject to the LLIP shall not adversely impact NYCA resource adequacy**
  - To mitigate the adverse impact to resource adequacy, Large Loads must be associated with a Co-Located Resource or Partner Resource (such as generation) and/or take Non-Firm Withdrawal Service
  - As further described in the next slides, Large Load projects will be assessed on their impact to resource adequacy, not whether there is a violation of resource adequacy criteria
- **NYISO will evaluate Large Load projects in accordance with the Resource Adequacy Impact Standard to determine level of firm withdrawal rights:**
  - If load does not co-locate or partner with new resources, then Non-Firm Withdrawal Service
  - If load co-locates or partners with new resources that adequately mitigate the load's resource adequacy impact, then Firm Withdrawal Service*
  - If load co-locates or partners with new resources that partially mitigates the load's resource adequacy impact, then partial Firm Withdrawal Service

*Firm Withdrawal Service is still subject to mitigating any transmission security violation. Large Load would only obtain Firm Withdrawal Service once co-located or partner resources are in service.

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Timing of Resource Adequacy Impact Evaluation

- **Resource adequacy impact could be evaluated at different stages**
  - Will be evaluated at the beginning of the LLIP study
  - During the ALI if during the ALI Entry Decision, the Large Load:
    - Modifies the load (e.g., reduction of MW and changes to Co-Located or Partner Resource arrangements)
    - Modifies or identifies an Associated Resource
  - At any point thereafter as part of a modification review if the Large Load:
    - Modifies the load
    - Modifies or identifies an Associated Resource

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Resource Adequacy Impact Methodology

- **The most recent resource adequacy model from the Reliability Planning Process (RPP) will be used to evaluate the impact of each Large Load project on NYCA resource adequacy. Large Load and associated resource will be tested together under the understanding that the associated resource will receive CRIS (or, if a Demand Side Resource, Capacity rights)**
- **Step 1: Pass/fail de minimis impact**
  - If the combined Large Load project along with associated resource degrades resource adequacy by more than 25 MW, go to step 2
  - MW impact will be based on comparable “perfect capacity” calculated consistent with how NYISO evaluates compensatory MW
- **Step 2: Partial Firm Withdrawal Service MW determination**
  - To determine Partial Firm Withdrawal Service MW amount for the Large Load, NYISO will determine how much of the Large Load must be “flexible” to bring the LOLE back to the pre-project level.
  - In the resource adequacy simulation, flexible load will be reduced prior to employing EOPs such as SCRs, reduction of reserves, or emergency assistance

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Additional Resource Adequacy Evaluation Details

- A Large Load and its Associated Resource(s) will be tested together in the Resource Adequacy Evaluation
  - Consideration for the associated resource's type, location, and expected availability is inherent to the resource adequacy calculation
- The Resource Adequacy Evaluation consider years 1 through 10 as represented in the most recent RPP model
- NYISO intends to publish information on the resource adequacy impact of representative resources in its RPP reports, which may be referenced by Eligible Customers/stakeholders

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System Impact Study

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SIS: Transmission Security Analysis

- Analysis performed in accordance with the SIS scope and the Transmission Security Standard
- NYISO is responsible for evaluating Bulk Electric System (BES), and TOs are responsible for evaluating non-BES
- For each violation, the NYISO/TO will identify if it can be resolved by Non-Firm Withdrawal Service
  - If not, the violation must be addressed by upgrades or adjustments to project size
- NYISO will determine preliminary Firm and Non-Firm Withdrawal Service MWs based on the observed violations

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SIS: Impact Allocation

- **NYISO: calculates each project's impact to observed BES violations**
- **TOs: calculate each project's impact to observed non-BES violations**
- **Impact allocation methodologies will be documented in NYISO Procedures**
  - For thermal violations and thermal transfer limit degradations, DFAX and project size will likely be used as the basis
  - For voltage/stability violations and voltage/stability transfer limit degradations, impact allocation methodology is under development

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SIS: Network Upgrades

- TOs: Identify preliminary potential Network Upgrades and corresponding preliminary non-binding cost estimates and time to construct estimates
- TOs: Provide non-binding, good faith cost estimates and time to construct estimates for preliminary Attachment Facilities as determined in the RAMP

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SIS: Report and Committee Meetings

- Within 90 days from SIS commencement, NYISO and the TOs will provide the draft SIS report to the Eligible Customers for review
- NYISO and TOs will finalize the SIS report and present the finalized SIS report at TPAS and OC meetings for approval
- NYISO will post the SIS report to MyNYISO following OC approval

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Assessment of Load Integration (ALI)

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ALI Entry Decision

- The customer will have 7 days from the date of SIS report approval by the OC to elect whether they will enter the Assessment of Load Integration (ALI) and subsequent Facilities Study
  - If yes, the customer must:
    - Provide Study Deposit 2
    - Indicate any reduction in project size
    - Indicate any changes to associated resources including Co-located and/or Partner Resources in order to take Firm and Non-Firm Withdrawal Service MW, as applicable
  - If no, the project will be withdrawn
    - Failure to respond in a timely manner will be considered a withdrawal
- The customer will make their elections in the Interconnection Projects Portal
- NYISO will re-perform the RA evaluation during the ALI for any projects that elected to reduce its size or made changes to their associated resources

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ALI: Base Case and Inclusion Rules

- The ALI base cases will use the year 5 cases from the most recent STAR
- TOs will provide NYISO with system changes to reflect in the ALI base case and updates to associated study files
- System changes will primarily include Large Loads evaluated in the previous LLIP cycle and as identified by the TO but were not included in the most recent STAR base cases

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ALI: Scoping

- **Analysis to be performed in accordance with the ALI scope**
  - ALI scope will depend on the ALI Entry Decisions and system changes as provided by the TOs
- **NYISO will draft the ALI scope and provide the scope to the impacted CTOs and ATOs for review**

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ALI: Transmission Security Analysis

- **NYISO is responsible for evaluating BES**
  - Steady state (thermal and voltage)
  - Stability
  - Thermal/voltage/stability transfer
  - Short-circuit/fault duty,
  - EMT screening analysis, such as SSR/SSTI/SSCI/SCR
- **NYISO will confirm Firm and Non-Firm Withdrawal Service MWs based on the observed violations and results of the assessment of resource adequacy impacts**

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ALI: Impact Allocation

- NYISO: confirms each project's impact to observed BES violations

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ALI: Sensitivities

- NYISO: Performs sensitivities to identify how violations and impact allocation percentages could change if one or more Large Load Projects withdrew or failed to accept cost allocation based on the applicable TO's requirements

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ALI: Network Upgrades

- **TOs: design Network Upgrades as part of the Facilities Study and provide the upgrades to NYISO**
  - With consideration for alternative transmission technologies if not considered in the SIS
- **NYISO: confirms that the combination of Network Upgrades and Non-Firm Withdrawal Service (if applicable) resolve all transmission security violations observed on the BES and adverse impacts to resource adequacy**

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ALI: Outcomes

- **Transmission security analyses**
  - Violations observed through transmission security analyses, such as thermal overloads, voltage violations, overdutied breakers, and transfer degradations
- **Impact allocation**
  - Individual contributions of projects to the observed violations
- **Firm and Non-Firm Withdrawal Service MW**
  - Final allocation of Firm and Non-Firm Withdrawal Service MW based on combination of impact to resource adequacy and transmission security
  - Identification of which observed violations must be resolved with upgrades and the associated Firm Withdrawal Service MW amount that is contingent on those upgrades

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ALI: Results

- NYISO will provide the draft ALI results to the TOs and Eligible Customers for review prior to finalization
- NYISO will post the ALI results to MyNYISO following finalization

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Post-LLIP Study

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Facilities Studies

- **Facilities studies will remain two-party between Eligible Customer and CTO (with involvement of ATOs and Affected Systems, as needed)**
  - TOs will continue to be responsible for determining cost allocation of Network Upgrades
  - TOs can use the impact allocation findings to determine the appropriate cost allocation for the Network Upgrades during the Facilities Study

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Transmission Service Agreement (TSA)

- **Transmission Service Agreement (TSA)**
  - Three-party pro forma agreement between NYISO, Transmission Customer, and Large Load (if Large Load is not its own Transmission Customer/LSE) to be added to the NYISO OATT
    - NYISO is considering a three-party format in order to address transmission and operational requirements in one place and avoid having multiple agreements
    - Given the NYISO's financial reservation-based transmission services, the content of a NYISO TSA will likely differ from a traditional pro forma TSA
  - The TSA will address and incorporate by reference obligations under the tariff, including the following:
    - Obligations for Firm and Non-Firm Withdrawal Service
    - Operational and performance requirements, e.g., ramp rate limits and curtailment/disconnection obligations
    - Other applicable tariff obligations of the Transmission Customer and Large Load while highlighting important specific requirements

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Interconnection Agreements

- **Load Interconnection Agreement**
  - Two-party agreement between Transmission Owner and Large Load
  - Identifies required Network Upgrades and Large Load's cost responsibility
  - May contain security requirements associated with cost responsibility and liabilities specified under the IA (or in a separate two-party cost recovery agreement)
- **Possible Revisions to NYISO's Standard Interconnection Agreement**
  - The NYISO is considering whether additions or revisions to the Standard Interconnection Agreement will be needed to address Large Load issues related to Co-Located Resources and Partner Resources that are not encompassed by other agreements or addressed in the tariff

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Queue Withdrawal Rules

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Withdrawal

- **A Large Load project will be withdrawn from the LLIP when it (a) submits written notice of withdrawal or (b) fails to adhere to all requirements in the LLIP including, for example, the following circumstances**
  - Failure to timely pay a monthly invoice
  - Failure to cure a Large Load Integration Request deficiency within the allotted time
  - The Large Load project does not elect to continue to the SIS at the SIS Entry Decision Point
  - The Large Load project does not elect to continue to the ALI at the ALI Entry Decision Point
  - The Large Load project does not satisfy a milestone demonstrating that the Eligible Customer accepts its cost responsibility for Network Upgrades and Attachement Facilities in accordance with the requirements established by the applicable Transmission Owner within fourteen (14) Calendar Days of the completion of the Facilities Study
- **Withdrawn projects must re-enter the LLIP with a new Large Load Integration Request**

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Large Load Modifications Proposal

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Modification Requests

- **Large Loads (and existing loads greater than or equal to 50 MW or requesting an incremental increase for a total of 50 MW or greater) must submit a modification request for changes, such as:**
  - An incremental change to the requested withdrawal amount of 1 MW
  - Load type and operating characteristics
  - Interconnection configuration
  - Co-location arrangements including the addition of new Generators, changes to existing or planned Generators consistent with the current modification rules for Generators (Attachment HH)
- **NYISO will determine (with input from the CTO/ATO/Affected Systems) if the requested modification is deemed material based on the nature of the modification**
  - Studies will be performed, if needed, to evaluate the impact of the modification
    - MW thresholds that trigger studies are described in next slide
  - Studies may include limited sensitivity analyses or inclusion in the next available LLIP cycle

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MW Threshold Subject to LLIP Study Procedures

Load Status	LLIP Modification Study Trigger <u>No</u> Change to Load Type (compared to baseline MW)	LLIP Modification Study Trigger Change to Load Type (compared to baseline MW)	Baseline MW**
Existing Projects			
Grandfathered in Group A	**+10 MW** de minimis	Any change	As documented in June 2026 NYISO Interconnection Queue
In-service before 6/18/26	**+50 MW** de minimis	Any change (if total is 50 MW or greater)	As determined by CTO
Future Projects*			
Proposed	Any change	Any change	As proposed in IR
In-service	**+10 MW** de minimis	Any change	As proposed in IR (or as last studied under LLIP)

*Including loads in service before 6/18/26 after 50 MW de minimis threshold is exceeded

**Baseline resets after completion of modification review and Eligible Customer proceeds with modification, or as last studied under LLIP, as applicable

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Modification of Existing Loads In Service before 6/18/26

- **Modification requests for loads in service prior to 6/18/26 are required to be studied under the LLIP in the following instances:**
  - An incremental change to the requested withdrawal amount of 50 MW or greater compared to the existing load's baseline
    - Note: Incremental increases to the requested withdrawal amount less than 50 MW will be subject to the CTO interconnection procedures
  - Modification to load type and operating characteristics
    - Existing loads will not be subject to the Large Load performance requirements under the Large Load Integration Procedures unless they materially change their load type and operating characteristics

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Modification of Proposed Loads included in Transition Group A

- **Modification requests for load projects in transition Group A are required to be studied under the LLIP in the following instances:**
  - An incremental change to the requested withdrawal amount of 10 MW or greater compared to the load project's baseline
    - Note: Incremental increases to the requested withdrawal amount less than 10 MW will be subject to the CTO interconnection procedures
  - Modification to load type and operating characteristics
    - Proposed loads in Transition Group A will not be subject to the Large Load performance requirements under the LLIP unless they materially change their load type and operating characteristics

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Modification of Proposed Large Loads

- **For all other proposed Large Loads, limited project modifications are allowed at specified decision points in the LLIP (e.g., reduction of MW and changes to Co-Located or Partner Resource arrangements)**
  - Other modifications cannot be proposed until the completion of the LLIP studies
- **Upon completion of the LLIP process, Eligible Customers may submit a request for a modification for changes, such as:**
  - An incremental change to the requested withdrawal amount of 1 MW compared to the load project's baseline
  - Load type and operating characteristics
  - Interconnection configuration
  - Changes to Co-location or Partner arrangements including the addition of new Generators, changes to existing or planned Generators consistent with the current modification rules for Generators (Attachment HH)

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Modification of Large Loads In Service after 6/18/26

- **Once a Large Load enters service, Eligible Customers may submit a request for a modification for changes, such as:**
  - An incremental change to the requested withdrawal amount of 10 MW or greater compared to the load's baseline
    - Note: Incremental increases to the requested withdrawal amount less than 10 MW will be subject to the CTO interconnection procedures
  - Load type and operating characteristics
  - Co-location or Partner arrangements including the addition of new Generators, changes to existing or planned Generators consistent with the current modification rules for Generators (Attachment HH)
  - An Eligible Customer taking Non-Firm Withdrawal Service requests evaluation for additional MWs of Firm Withdrawal Service by identifying network upgrades

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Load Affected System Study

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Load Affected System Study Process

- **When NYISO is notified by a neighboring Transmission Planner/Planning Coordinator of a proposed load project for which NYISO and NY TOs may be affected, NYISO will commence a Load Affected System Study (LASS) to evaluate the reliability impact of the proposed load project**
- **NYISO will identify and notify any potentially impacted NY TOs, arrange a scoping meeting, and develop the LASS scope**
  - The scope will identify the transmission security analyses to be performed
  - NYISO is responsible for evaluating BES, and TOs are responsible for evaluating non-BES
  - The LASS will commence upon agreement of scope finalization by NYISO and NY TOs

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Load Affected System Study

- **NYISO and NY TOs will develop a LASS report, and provide the report to the neighboring Transmission Planner/Planning Coordinator**
  - If adverse impacts to reliability are identified, NYISO and NY TOs will identify potential Affected System Upgrades(s), and provide preliminary cost and time to construct estimates in the LASS report
- **Affected System Upgrades(s) may then proceed directly from the Transmission Interconnection Application to the TIP Facilities Study as described in Attachment P to the NYISO OATT**

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Large Load Performance Requirements

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Performance Requirements

- **Large Loads will be subject to performance requirements**
  - Large Loads must meet the most stringent of all applicable performance requirements, e.g., NERC, NPCC, NYSRC, or CTO performance requirements
  - Non-Computational Large Loads may request exemption from specific performance requirements
  - Performance requirement details will be documented in NYISO procedures
    - The specific criteria listed in this section are preliminary and subject to change
  - Large Loads taking Non-Firm Withdrawal Service must meet the Active Power Ramp Rate requirements and be able to follow base points—i.e., be fully dispatchable
  - Existing load projects will not be subject to the Large Load performance requirements under the Large Load Integration Procedures unless there is a material change their load type and operating characteristics
- **Performance requirements include:**
  - Operating
  - Protection and control
  - Monitoring

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Process for Requesting Exemption from Performance Requirements

- **NYISO proposes a process by which Non-Computational Large Loads may request exemption for specific performance and/or protection and control requirements**
  - Use of compensatory equipment (e.g., E-STATCOMs, battery energy storage systems, super capacitors, or rack-level storage) as a solution will be considered when evaluating the request for exemption
- **Customers may request exemption as part of the IR or as part of the modification process**
- **Customers must identify the requirements for which they request exemption; provide justification for why the requirements cannot be met; and propose an alternative to the requirement**
  - If exemption is requested as a modification, the customer must also provide technical rationale to support that the proposed alternative would not adversely impact the reliability of the transmission system
- **NYISO and/or TO may need to perform additional studies to determine if a proposed alternative to a requirement is permissible**
  - Exemption will not be granted if it is determined to create reliability concerns/violation

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Proposed Operating Requirements

Exemption Eligible for Non-Computational Large Loads	Category	Preliminary Proposed Requirement
X	Active Power Ramp Rate*	Considering 100 MW/5-minutes for individual facilities (100 MW/min NYCA wide)
X	Active Power Recovery	90% of pre-disturbance level within 1.0 seconds of voltage recovering to ≥ 0.90 per unit
X	High & Low Voltage Ride Through*	See next slide
X	High & Low Frequency Ride Through*	See next slide
X	Multi-disturbance Ride Through*	Avoid disconnection based only on expected reclosures or dip counting. If using disturbance counter logic, coordinate with the transmission owner or operator.
	Stable Operation	Facilities must not cause amplification (negative damping) of power oscillations in response to small deviations in voltage and frequency within the continuous operating range.
	Torsional & Controller Interaction	Must not have adverse interactions with nearby power system equipment. Compensatory devices required if adverse interaction cycling is expected. Subject to EMT screening and EMT studies, as needed
	Cycling	Must not introduce repetitive power cycling into the power system. Compensatory devices required if load cycling is expected. Subject to EMT screening and EMT studies, as needed
X	Reactive Power Capability Requirement	Large load facilities must be designed to maintain power factor within the range of 0.95 leading to 0.95 lagging at the POI under normal conditions during steady state operation
X	Voltage Phase Jump Ride Through*	Must be able to ride-through voltage phase angle jumps of ±25 degree

* Ramp rate and ride-through requirements referenced in FERC Show Cause order

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Proposed Voltage Ride-Through Requirements

RMS Positive Sequence Voltage (p.u.)	Minimum Ride-Through Time (s)
V>1.20	May ride-through or trip
1.10<V≤1.20	0.5
0.9≤V≤1.10	Continuous operation, no trip.
0.80≤V<0.90	2
0.50≤V<0.80	0.5
V<0.50	0.15

During low voltages (<0.9 p.u.), power consumption may be temporarily reduced

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Proposed Frequency Ride-Through Requirements

System Frequency (Hz)	Minimum Ride-Through Time (s)*
>61.8	May trip
>61.2	299
≤ 61.2 and ≥ 58.8	Continuous
<58.8	299
<57.0	May trip

*Unless the load is identified by the transmission owner as part of the UFLS program then subject to applicable reliability requirements

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Proposed Protection and Controls

Exemption Eligible for Non-Computational Large Loads	Category	Preliminary Proposed Requirement
	Remote disconnect ability*	Remote disconnect ability by CTO (NYISO can request disconnect of a Large Load by CTO when reliability is at risk)
	Injection/Withdrawal Limits*	Injection and withdrawal limits for co-located facilities implemented with appropriate controls (no automatic breaker operation allowed at the POI voltage)
X	Active Power Variation Monitoring Relays	Active-power variation monitoring relays required

* Remote disconnect ability and withdrawal limit control requirements referenced in FERC Show Cause order

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Proposed Monitoring Requirements

Exemption Eligible for Non-Computational Large Loads	**Preliminary Minimum Telemetry Requirements***
	Phase 1 analog metering
	Revenue grade metering
	SCADA MW/MVAR metering
	Digital fault recorder (DFR)
	Phasor measurement unit (PMU) installations
	Sequence of events recorder (SER)
	Dynamic disturbance recorder (DDR)

*Telemetry requirements referenced in FERC Show Cause order

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LLIP Transition Proposal

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Transition Plan Considerations

- **This proposed transition plan shows how load projects currently in the NYISO interconnection queue may proceed**
- **To the extent possible, this potential transition plan aims to:**
  - Not disrupt existing commercial arrangements
  - Allow a reasonable amount of time for finalization of nearly complete agreements
  - Consider system reliability implications
  - Continue existing and ongoing study efforts

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Preliminary Transition Plan Outline

- **A project's transition plan depends on the milestones achieved by the project as of the dates indicated below:**

Transition Group	Milestones Met	Transition Plan	Eligible For Group* *(preliminary estimate)*
A	1. IR submitted before 6/18/26; **and** 2. OC approved SIS scope before 6/18/26; **and** 3. OC approved SIS report before 3/1/27; **and** 4. Execution of one or more Qualifying Agreements before 11/16/26; **and** 5. Facilities Study ongoing or completed before 11/16/26 or not required; **and** 6. Security and/or milestone payment posted to CTO and/or ATO by 3/1/27	Grandfathered	3.6 GW
B	1. IR submitted before 6/18/26; **and** 2. OC approved SIS scope before 11/16/26; **and** 3. OC approved SIS report before 6/1/27; **and** 4. Execution of one or more Qualifying Agreements before 6/1/27; **and** 5. Not included in Group A	Transitional LLIP Study ("L0")	9.8 GW
C	1. Not included in Group A; **and** 2. Not included in Group B	L1	TBD

*Excludes in-service loads and loads that do not meet the proposed Large Load definition. Based on available information and subject to change.

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Current Projects that would not meet the Proposed Large Load Definition

- **Some existing load projects do not meet the proposed definition for a Large Load**
  - These projects would not be subject to NYISO Large Load Integration Procedures but would be subject to TO interconnection procedures
    - Proposed load project less than 50 MW
    - Proposed incremental increase to an existing load project greater than 10 MW for a total of less than 50 MW
  - For existing load projects that do not meet the proposed definition for a Large Load, that have an IR submitted before 6/18/26 and an SIS scope approved before 11/16/26, NYISO will complete the SIS as scoped
    - After completion of the SIS, the projects will be withdrawn from the NYISO interconnection queue and may continue through the TO interconnection processes
    - Alternatively, these projects may choose to withdraw from NYISO's queue at any time and proceed through the TO interconnection processes

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Transition Group A

- **Milestones for Group A consideration:**
  - IR submitted before 6/18/26; and
  - OC approved SIS scope before 6/18/26; and
  - OC approved SIS report before 3/1/27; and
  - Execution of one or more Qualifying Agreements before 11/16/26; and
  - Facilities Study ongoing or completed before 11/16/26 or not required; and
  - Security and/or milestone payment posted to CTO and/or ATO by 3/1/27
- **Interim Plan:**
  - All unfinished SISs and Facilities Studies will continue to be studied
- **Proposed Transition Plan:**
  - Grandfathered projects must complete the existing NYISO and TO interconnection study processes
  - Grandfathered projects must take firm withdrawal service and mitigate the applicable transmission security violations as determined in the Facilities Study
    - Projects that wish to obtain non-firm withdrawal service may elect to join Group B
  - Group A projects would bypass the LLIP study process, continue through Facilities Studies with the CTO as needed, and are eligible to receive full Firm Withdrawal Service once upgrades are in-service
    - Future modifications to these projects would be subject to the Large Load Modification Process

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Qualifying Agreements

- **NY TOs determined the following are qualifying agreements:**
  - Study Work Agreement (not SIS Study Agreement)
  - Support Services Agreement
  - Transaction Forms
  - Master Services Agreement
  - Cost Reimbursement Agreement
  - Facility Study Agreement
  - Interconnection Agreement
  - Development Agreement
  - Engineering and Procurement Agreement
  - Security Agreement

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Transition Group B

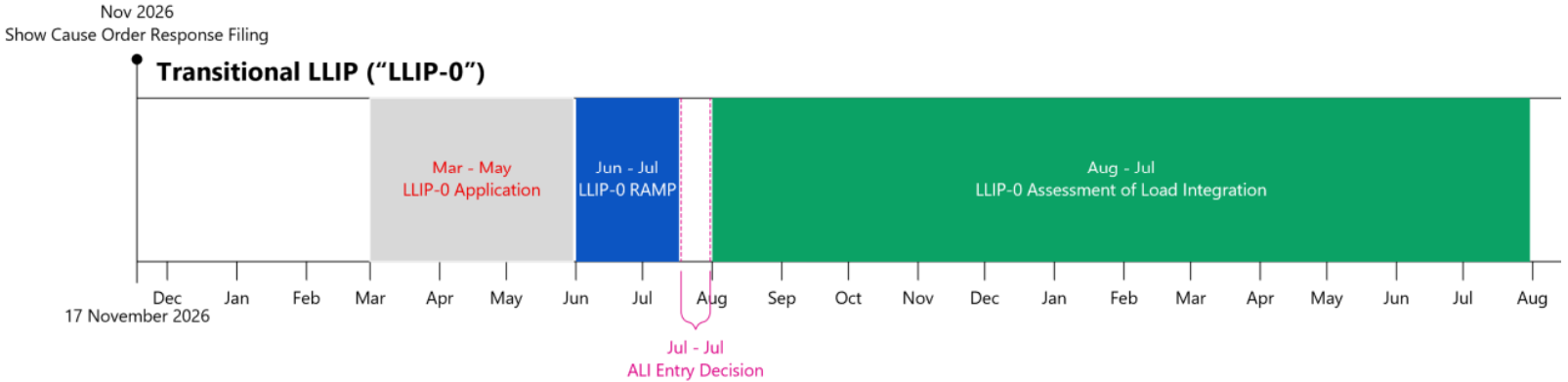
- **Milestones for Group B consideration:**
  - IR submitted before 6/18/26; and
  - OC approved SIS scope before 11/16/26; and
  - OC approved SIS report before 6/1/27; and
  - Execution of one or more Qualifying Agreements before 6/1/27; and
  - Not included in Group A
- **Interim Plan:**
  - Targeting presenting all outstanding SIS scopes for projects with IRs submitted before 6/18/26 for TPAS/OC approval no later than October 2026
  - Targeting completion of unfinished SISs before 6/1/27
- **Proposed Transition Plan:**
  - Group B projects would proceed through a transitional LLIP Study (“L0”)
  - Group B projects would be subject to the Resource Adequacy Evaluation and enter an Assessment of Load Integration
  - Group B projects may make modifications to their project compared to the project as studied in the SIS, except:
    - Increase of MW or MVAR load
    - Change in POI (limited POI updates may be allowed if agreed to by CTO)

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Proposed Transitional LLIP (“L0”) and Potential Schedule

- **L0 would consist of:**
  - Application opens 3/1/27 (Application fee required)
  - Resource Adequacy and Modeling Period (6/1/27 through 7/15/27)
  - Assessment of Load Integration (8/1/27 through 7/31/28)
  - NYISO would not perform a new SIS for these projects



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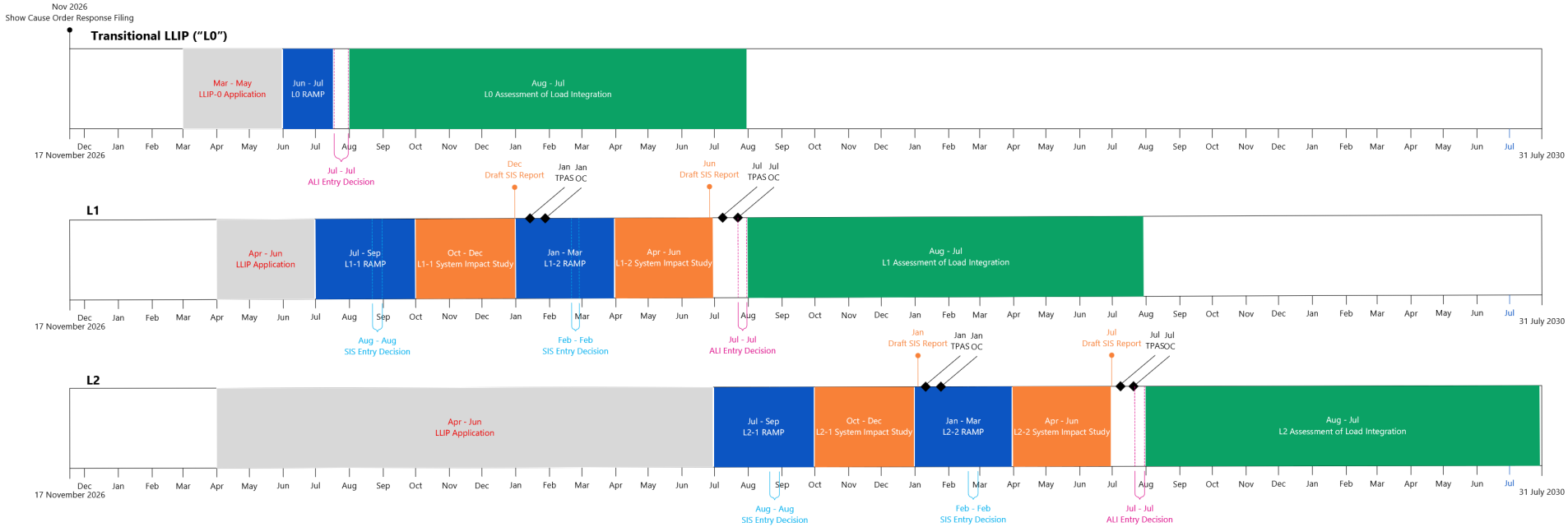
Transition Group C

- **Milestones for Group C consideration:**
  - Not included in Group A
  - Not included in Group B
- **Proposed Transition Plan:**
  - Projects will be withdrawn from the NYISO interconnection queue
  - Projects may submit a pre-application request under the LLIP beginning on the effective date of Attachment LL
  - Projects may apply for L1 beginning on 4/1/27

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Proposed LLIP Cycle Schedule



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Large Load Tracking

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Project Tracking Process

- **Proposal for a new load interconnection webpage on the NYISO website for hosting information on Large Loads including:**
  - Project tracking spreadsheet including project size, in-service date, project type, location, status, etc.
  - Geographical maps
  - Dashboards with visuals summarizing projects by type, size, status, and location
  - Network Upgrade tracking spreadsheet for projects that have completed an SIS including the type of equipment, cost estimates, and status of Network Upgrades
- **Information on the load interconnection webpage to be updated monthly**

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LLIP Study Examples

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Illustrative Examples

- **The following examples are for illustrative purposes only**
  - Resource adequacy results mentioned are comparative examples and are not based on simulation results
  - The examples assume an “always on” load with 100% capacity factor
- **Operating characteristics of proposed load projects and associated resources will be considered during resource adequacy impact evaluations**

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Resource Adequacy Evaluation: Illustrative Example 1

- Load Project: 100 MW load in Zone B
- Associated Resource: None
- RA test results: N/A
- Outcome: 100 MW Non-Firm Withdrawal Service

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Resource Adequacy Evaluation: Illustrative Example 2

- **Load Project: 100 MW load in Zone B**
- **Partner Resource: 100 MW solar in Zone C and 50 MW 8-hr battery storage in Zone E**
- **RA test results:**
  - RA impact = -15 MW (less than 25 MW de-minimis)
  - Flexible load amount: N/A
- **Outcome: 100 MW Firm Withdrawal Service**
  - Note: Large Load would only obtain Firm Withdrawal Service once co-located or partner resources are in service

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Resource Adequacy Evaluation: Illustrative Example 3

- **Load Project: 100 MW load in Zone B**
- **Partner Resource: 50 MW wind in Zone C and 25 MW 4-hr battery storage in Zone E**
- **RA test results:**
  - RA impact = -65 MW (greater than 25 MW de-minimis)
  - Flexible load amount to return to pre-Project LOLE = 65 MW
- **Outcome: 35 MW Firm Withdrawal Service, 65 MW Non-Firm Withdrawal Service**
  - Note: Large Load would only obtain Firm Withdrawal Service once co-located or partner resources are in-service

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LLIP Outcome Example: Option 1

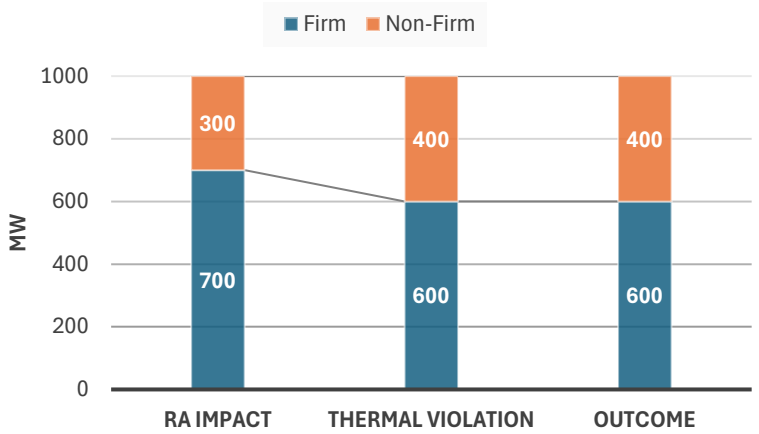
1000 MW Large Load with Co-Located or Partner Resource

- Project does not associate with additional resources and does not choose to pursue upgrades

Adverse reliability impacts		Potential outcomes
300 MW adverse impact to resource adequacy	⟺	Accept 300 MW non-firm for RA impact
Thermal violation on a 345 kV transmission line when the load is greater than 600 MW	⟺	Accept 400 MW non-firm withdrawal service for thermal violation

LLIP Outcome = 400 MW Non-Firm Withdrawal Service and 600 MW Firm Withdrawal Service

Non-Firm Withdrawal Service Based Outcome



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LLIP Outcome Example: Option 2

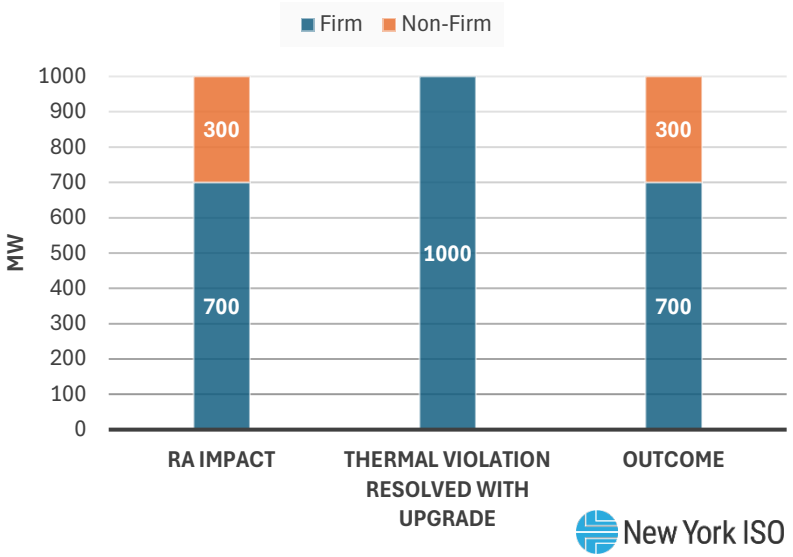
1000 MW Large Load with Co-Located or Partner Resource

- Project does not associate with additional resources but chooses to pursue upgrades

Adverse reliability impacts		Potential outcomes
300 MW adverse impact to resource adequacy	⟺	Accept 300 MW non-firm for RA impact
Thermal violation on a 345 kV transmission line when the load is greater than 600 MW	⟺	Network upgrade to mitigate thermal violation

LLIP Outcome = 300 MW Non-Firm Withdrawal Service and 700 MW Firm Withdrawal Service

Thermal Upgrade Based Outcome



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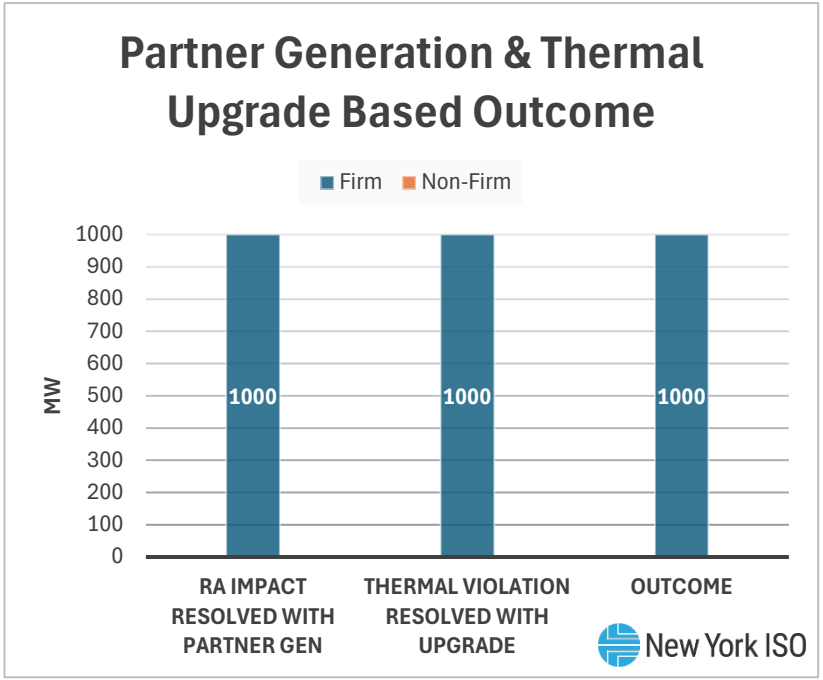
LLIP Outcome Example: Option 3

1000 MW Large Load with Co-Located or Partner Resource

- Project identifies additional associated resources and chooses to pursue upgrades

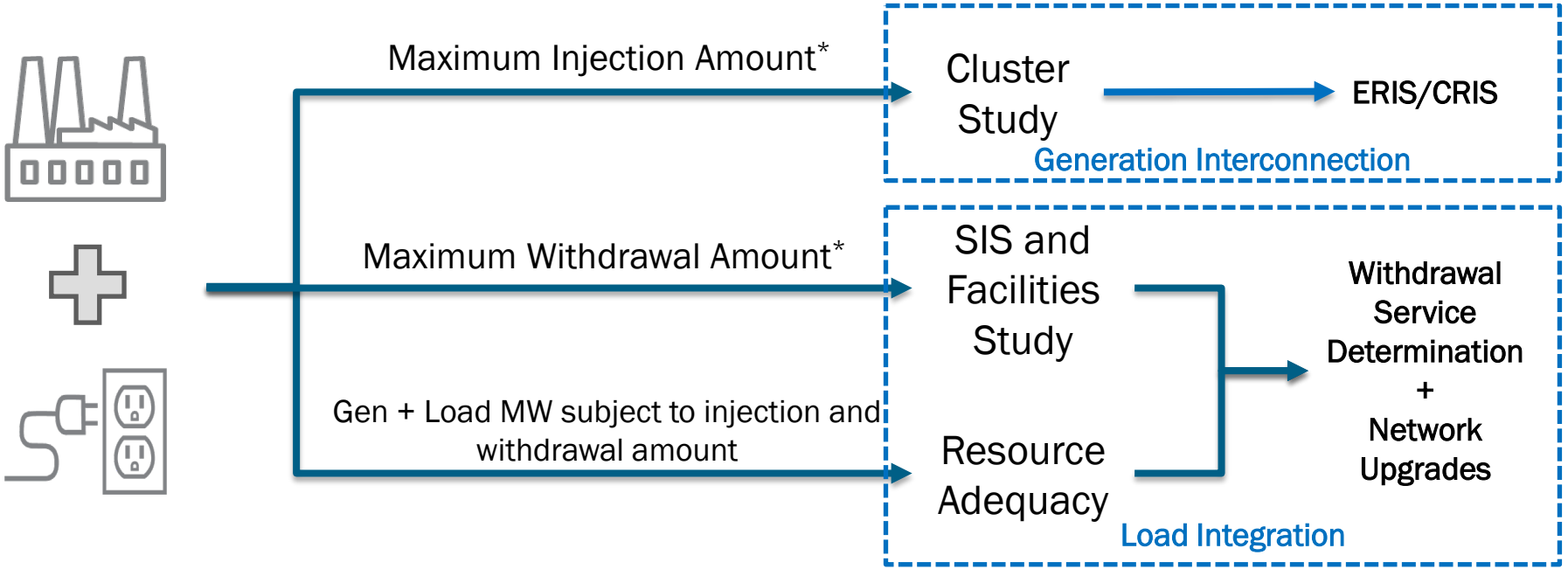
Adverse reliability impacts		Potential outcomes
600 MW adverse impact to resource adequacy	⟺	Identifies additional Partner generation
Thermal violation on a 345 kV transmission line when the load is greater than 600 MW	⟺	Network upgrade to mitigate thermal violation

LLIP Outcome = 1000 MW firm



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Co-Located Large Load and Generation Evaluation

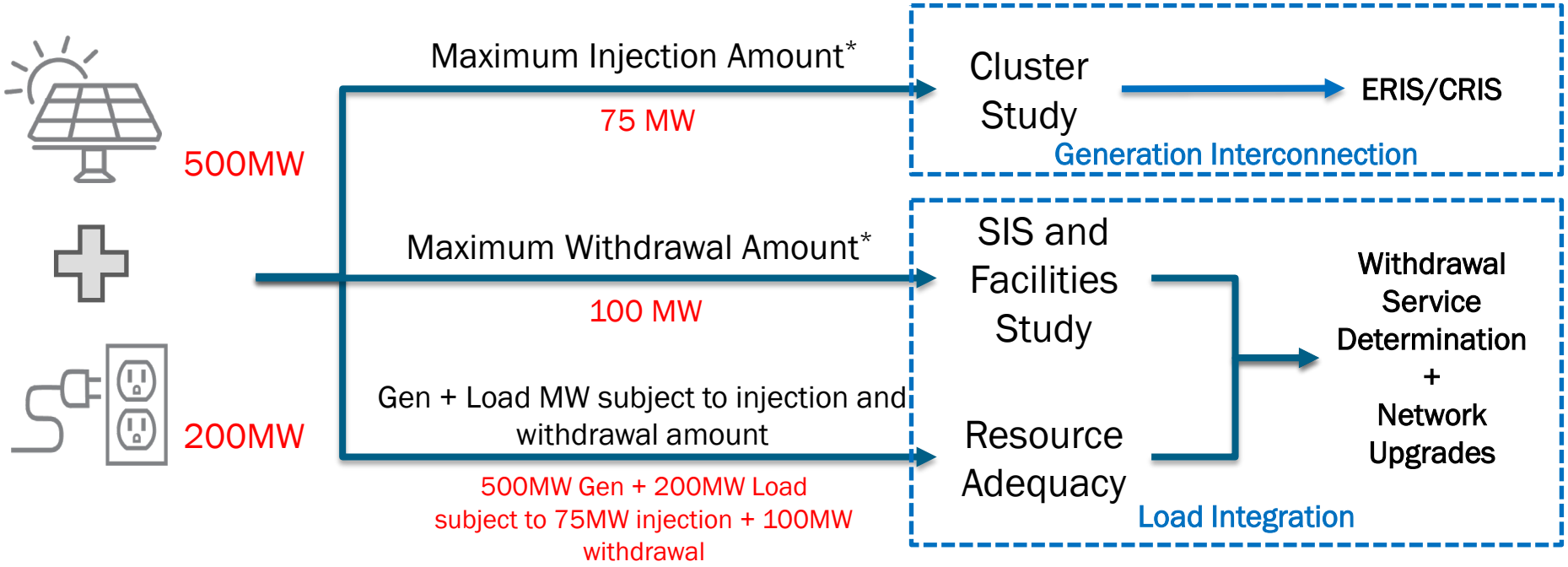


*effectuated using appropriate control mechanism

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Co-Located Large Load and Generation Example 1

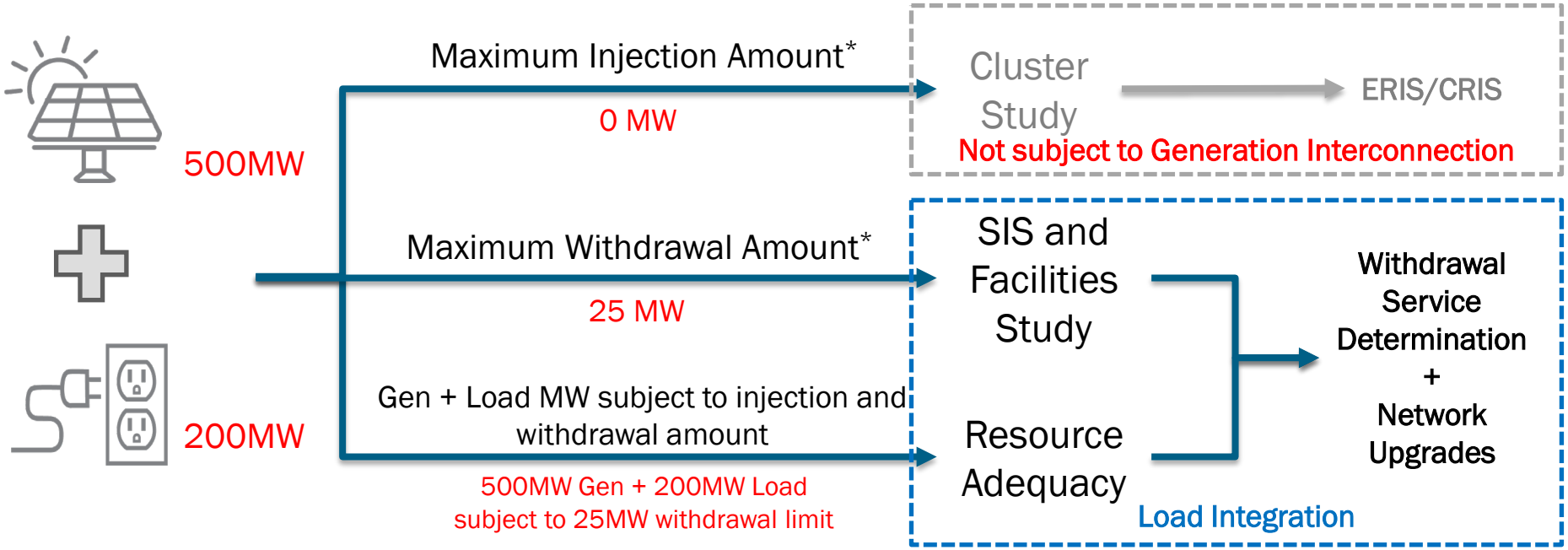


*effectuated using appropriate control mechanism

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Co-Located Large Load and Generation Example 2

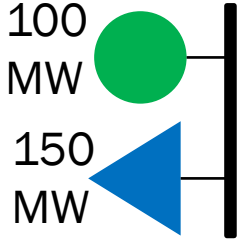


*effectuated using appropriate control mechanism

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Co-Located Facilities Examples

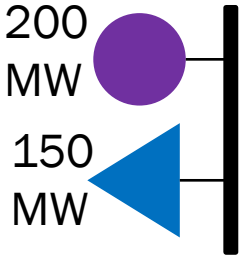


Example A
Generator has CRIS
Withdrawal request = **150 MW**
Adverse RA Impact

Withdrawal Service
Firm = 80 MW
Non-Firm = 70 MW
Zero = 0 MW

Example B
Generator has CRIS
Withdrawal request = **50 MW**
Adverse RA Impact

Withdrawal Service
Firm = 10 MW
Non-Firm = 40 MW
Zero = 100 MW



Example C
Generator has CRIS
Withdrawal request = **150 MW**
Adverse RA Impact

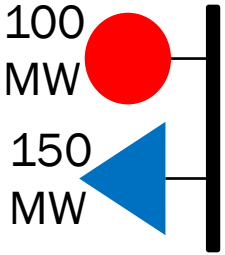
Withdrawal Service
Firm = 90 MW
Non-Firm = 60 MW
Zero = 0 MW

Example D
Generator has CRIS
Withdrawal request = **150 MW**
No Adverse RA Impact

Withdrawal Service
Firm = 150 MW
Non-Firm = 0 MW
Zero = 0 MW

Example E
Generator has CRIS
Withdrawal request = **50 MW**
No Adverse RA Impact

Withdrawal Service
Firm = 50 MW
Non-Firm = 0 MW
Zero = 100 MW



Example F
Generator does not have CRIS
Withdrawal request = **150 MW**
Adverse RA Impact

Withdrawal Service
Firm = 0 MW
Non-Firm = 150 MW
Zero = 0 MW

Example G
Generator does not have CRIS
Withdrawal request = **50 MW**
Adverse RA Impact

Withdrawal Service
Firm = 0 MW
Non-Firm = 50 MW
Zero = 100 MW

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Large Load Market Design

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Withdrawal Services in the Markets

- **The new Large Load Interconnection Procedure (LLIP) will dictate which Withdrawal Service, or combination of Withdrawal Services, a Large Load may be eligible to take**
  - The Market Participant may only choose to take the Withdrawal Service options that are presented them by the NYISO resulting from the LLIP
    - A Load that is presented with the option of taking Firm Withdrawal Service, for example, cannot elect to instead take Non-Firm Withdrawal Service
- **A Large Load's type of Withdrawal Service, which is a Transmission Service, will in turn dictate how the Load interacts with the NYISO-Administered Wholesale Markets**

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Firm Withdrawal Service

- **Any portion of a Large Load that takes FWS is granted the right to use the transmission system to serve their Load in a price agnostic manner**
  - With the caveat that, subject to existing emergency operation procedures, FWS Loads may be required to curtail for reliability needs
- **A Large Load taking only FWS will be able to utilize the existing Load bid rules/structure**
  - These Loads may submit DAM bids, but are not required to, and their Load will be included in the DAM Load Forecast consistent with traditional Loads
  - These Loads will not be able to submit RTM bids, like Loads today
  - The inclusion of these MWs in the load forecast for the IRM is what creates the obligation for the NYISO to serve these Loads continuously and regardless of price, consistent with existing Load treatment today
  - Therefore, Large Loads taking FWS will be reflected in their LSE's ICAP obligations

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Non-Firm Withdrawal Service

- **NFWS Load MW are excluded from the Load Forecasts that are used in establishing the IRM and LCRs**
  - NFWS Load MW therefore do not contribute to their LSE's ICAP obligation, and no ICAP is procured on their behalf in the NYISO Capacity auctions
    - This may also exclude NFWS Loads from traditional ICAP charges
    - These Loads will instead pay a System Reliability Benefits Fee
  - Unlike FWS Loads, NYISO has no obligation to use Capacity Resources to serve NFWS Loads during peak hours, and these Loads therefore have no right to consume during times of peak demand

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Zero Withdrawal Service Load

- **Zero Withdrawal Service (ZWS) Loads are Large Loads that have not requested Withdrawal Service rights, and therefore cannot withdraw Energy from the grid**
  - ZWS Loads will be served entirely by either a Co-Located Local Generator or by a Co-Located Resource(s), as part of a Co-Located and Limited Load Configuration (CLLC)
    - A Co-Located Local Generator does not need ERIS/CRIS to serve co-located ZWS Load, and therefore does not need to complete the Cluster Study to do so
    - If the Generator(s) instead intends to operate as a Co-Located Resource(s) and make available excess net supply to the ISO-Administered Wholesale Markets, the Generator(s), then the Co-Located Resource(s) will need to proceed through the cluster study and obtain an appropriate amount of ERIS/CRIS
      - The Co-Located Resources and the ZWS Load will then participate in the markets under the new CLLC model

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Large Load Market Participation

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Large Load Market Participation

- **Large Loads may fall into one of two participation models, depending on the type of Withdrawal Service they take:**
  - Co-Located and Limited Load Configuration (CLLC) Participation Model
    - Standalone and co-located participation model for Limited Withdrawal Service Loads
  - Standalone Firm Withdrawal Service (Traditional Load model)
    - A Load taking only FWS that co-locates with Generation will be modeled independent of the co-located Generation in the markets
- **Standalone FWS Loads may additionally participate in the NYISO's Demand Response programs**

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Large Load Cost Allocation

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System Reliability Benefit Fee (SRBF)

- **The System Reliability Benefit Fee will act as a cost allocator for Limited Withdrawal Service Loads**
  - These Loads receive the benefit of reliable service when the power system is not under stressed conditions and the applicable LBMP is less than $200/MWh, despite not paying ICAP market costs
  - Reliable service is ensured by the procurement of capacity suppliers with obligations such as bidding into the Day-Ahead Market and complying with outage scheduling protocols
- **The SRBF will be applied to relevant Large Loads based on the amount of NFWS/ZWS MW studied and authorized by the LLIP**
  - I.e. this charge is not based on actual Large Load energy withdrawals
- **Absent this charge, Limited Withdrawal Service Loads would receive the benefits of stable and reliable system operations without correspondingly contributing to costs incurred to maintain reliable system operations**
  - The System Reliability Benefit Fee also introduces an incentive for Limited Withdrawal Service Loads to take actions to acquire full Firm Withdrawal Service rights

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SRBF – Equation

$SRBF_{Cm}$ = ($NFWS\ Load_{Cm}$ + $ZWS\ Load_{Cm}$) * (($NYCA\ IRM_{m}$) * ($NYCA\ Capacity\ Translation\ Factor_{m}$)) + $NYCA\ excess\ \%_{m}$) * $Spot\ Market\ Auction\ Clearing\ Price_{Cm}$

- Where:
  - $SRBF_{Cm}$ = the System Reliability Benefit Fee assessed to the LSE responsible for the kW associated with the portion of Limited Withdrawal Service Load *C* that is not taking Firm Withdrawal Service or Co-Located Local Load *C* for month *m*;
  - $NFWS\ Load_{Cm}$ = the amount of kW associated with the portion of a Limited Withdrawal Service Load or Co-Located Local Load *C* taking Non-Firm Withdrawal Service-supplied by the LSE for month *m*;
  - $ZWS\ Load_{Cm}$ = the amount of kW associated with the portion of a Limited Withdrawal Service Load or Co-Located Local Load *C* classified as a Zero Withdrawal Service Load for month *m*;
  - $NYCA\ IRM_{m}$ = the NYCA Installed Reserve Margin or the NYCA Winter Installed Reserve Margin that is in effect for the NYCA for month *m*;
  - $NYCA\ Capacity\ Translation\ Factor_{m}$ = the ratio of (i) NYCA Minimum Unforced Capacity Requirement for month *m*; and (ii) NYCA Minimum Installed Capacity Requirements in effect for month *m*;
  - $NYCA\ excess\ \%_{m}$ = the ratio of (i) the additional UCAP procured in excess of the NYCA Minimum Unforced Capacity Requirement as reported in the ICAP Spot Market Auction results for NYCA for month *m*; and (ii) NYCA Minimum Unforced Capacity Requirement as reported in the ICAP Spot Market Auction results for NYCA for month *m*;
  - $Spot\ Market\ Auction\ Clearing\ Price_{Cm}$ = the applicable ICAP Spot Market Auction Clearing Price for month *m* for the Capacity Region in which that Limited Withdrawal Service Load or Co-Located Local Load *C* is electrically located.

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SRBF - Residuals

- **Making Limited Withdrawal Service Loads subject to the SRBF will result in residual rents**
  - These Loads don't clear in the 2-sided ICAP auction – the charges collected from these Loads are not naturally allocated through any existing process
- **NYISO proposes a new allocation methodology that will assign these residuals to LSEs based on that LSE's share of the total NYCA-wide ICAP obligation**
  - This will mitigate these LSEs' Capacity costs

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Resolving Large Load Impacts on Resource Adequacy

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What is “Partnering”?

- **A new Large Load that has tangible RA impacts must bring new ICAP supply to market to achieve Firm Withdrawal Service**
  - The FERC Show Cause Order suggested that this could be accomplished by co-locating with new supply, or
  - Through the interconnection of new supply that is electrically proximate to the Large Load, i.e. less than two substations away
- **NYISO does not believe the concept of electrical proximity would result in an efficient design in the context of the NYISO’s existing rules and system**
  - The NYISO instead proposes to allow Large Loads to Partner with new ICAP Supply in the same capacity region as a means of mitigating any adverse RA impacts caused by the Load
  - NYISO believes the Partner construct achieves the same objectives as the electrically proximate generation specifications discussed in the FERC Show Cause Order
    - Utilizing a capacity region in place of electrical proximity is better suited to the NYISO’s markets

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CLA/PRA

- **Capacity certified through a Large Load Bilateral Transaction fulfills some or all of the LSE ICAP obligation associated with the Large Load**
  - A Large Load that is party to an Arrangement may lose some or all of its FWS rights if its Associated Resource(s) enter into an ICAP-Ineligible Forced Outage, Mothball status, becomes Retired, or otherwise exits the NYISO Capacity markets before the end of the 15-year term
  - The Associated Resource(s) will be delayed from entering an Outage State until the associated Large Load is able to reclassify as NFWS Load
    - This simultaneous transition will occur on the 1st of a month after the NYISO has been able to update its market models
  - If the reclassified Load seeks to partner/co-locate with a replacement Associated Resource, the Large Load will need to submit a request for modification to do so

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DSR/Agg Partnering

- **In order to qualify as an Associated Resource:**
  - A Demand Side Resource must never have participated in any of the NYISO's Demand Response programs prior to partnering with a Large Load
    - However, the physical Load behind the Demand Side Resource does not itself have to be new
  - To be considered new ICAP supply, the DER Facilities comprising a given Aggregation must have never participated in the NYISO markets prior to partnering with a Large Load

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Rules for Partnered DER Aggregations

- **The composition of an Aggregation that enters into a Partner Resource Arrangement with a Large Load will be required to lock its composition for the duration of the Arrangement**
  - A partnered Aggregation will be unable to add or remove DER Facilities to and from the Aggregation for the duration of the 15-year Arrangement term
  - If a DER Facility exits the Aggregation prematurely, the associated Large Load will need to submit a request for modification and may be required to reclassify in part or in full as NFWS Load

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Demand Side Resource Partnership Limitations

- **A Large Load that is receiving FWS through a Co-Located/Partner Resource Arrangement is ineligible to itself qualify as an Associated Resource**
  - Large Loads, including those receiving FWS through a Co-Located/Partner Resource Arrangement, may register as Demand Side Resources
  - NYISO will prohibit these Large Loads from subsequently qualifying as an Associated Resource and entering into a Co-Located/Partner Resource Arrangement with a second Large Load

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Associated Resource ICAP/UCAP Misalignment

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Resource ICAP/UCAP Misalignment

- **The Capacity Bilateral maintained between a Large Load taking FWS and its Associated Resource may not provide enough UCAP to fully satisfy the Large Load's UCAP obligation**
  - The difference will be made up for in the applicable LSE's ICAP obligation, resulting in the LSE needing to purchase additional capacity in the ICAP market auction
  - The Large Load is not required to reclassify as NFWS Load if this occurs

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DER Modeling Improvements and Baseline Enhancements

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DER Modeling Improvements

- **NYISO proposes to prohibit DSRs participating in the DER Participation Model with over 20MW of Demand Response capability from aggregation with other DER Facilities**
  - Large Demand Side Resources will be restricted to operating as part of an Aggregation of One
  - Additionally, Large Demand Side Resources will be modeled with a dedicated, unique PTID
- **These changes are necessary to provide necessary visibility into large DSR activity and will support real-time grid operations**

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DER Baseline Enhancements

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Proposed DSR Baseline Enhancements Example (Part 1/3)

- First Hour of Basepoints: MBMA is utilized; Counting minutes to determine which baseline method to use

Timestamp	6-Second Basepoint (MW)	5-Minute Basepoint (MW)	Actual Load (MW)	Meter-Before Snapshot	MBMA Response	ECBL	ECBL Response	Minutes since first basepoint	Minutes since last basepoint
1:09:30	0	0	90	n/a	n/a	100	n/a	0	60
1:09:36	0	0	90	n/a	n/a	100	n/a	0	60
1:09:42	0	0	90	n/a	n/a	100	n/a	0	60
1:09:48	0	0	90	n/a	n/a	100	n/a	0	60
1:09:54	0	0	90	90	n/a	100	n/a	0	60
1:10:00	2	90	88	90	2	100	n/a	0	0
1:10:06	4	90	86	90	4	100	n/a	0	0
1:10:12	6	90	84	90	6	100	n/a	0	0
1:10:18	8	90	82	90	8	100	n/a	0	0
...									
1:15:00	90	90	0	90	90	90	n/a	5	0
...									

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Proposed DSR Baseline Enhancements Example (Part 2/3)

- **Second Hour of Basepoints: ECBL is utilized; Continuously counting minutes**

Timestamp	6-Second Basepoint (MW)	5-Minute Basepoint (MW)	Actual Load (MW)	Meter-Before Snapshot	MBMA Response	ECBL	ECBL Response	Minutes since first basepoint	Minutes since last basepoint
2:10:00	90	90	5	n/a	n/a	95	90	60	0
2:10:06	90	90	5	n/a	n/a	95	90	60	0
2:10:12	90	90	5	n/a	n/a	95	90	60	0
2:10:18	90	90	5	n/a	n/a	95	90	60	0
...									
2:15:00	88	0	7	n/a	n/a	95	88	65	0
2:15:06	86	0	9	n/a	n/a	95	86	65	0
2:15:12	84	0	11	n/a	n/a	95	84	65	0
2:15:18	82	0	13	n/a	n/a	95	82	65	0
...									
2:20:00	0	0	85	n/a	n/a	95	n/a	0	0
...									
2:50:00	0	0	85	n/a	n/a	100	n/a	0	30
...									

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Proposed DSR Baseline Enhancements Example (Part 3/3)

- 60 Minutes have elapsed since last basepoint; Therefore, MBMA is utilized, with a new Meter Before Baseline value of 85 MW

Timestamp	6-Second Basepoint (MW)	5-Minute Basepoint (MW)	Actual Load (MW)	Meter-Before Snapshot	MBMA Response	ECBL	ECBL Response	Minutes since first basepoint	Minutes since last basepoint
3:19:54	0	0	85	85	n/a	100	n/a	0	60
3:20:00	2	90	83	85	2	100	n/a	0	0
3:20:06	4	90	81	85	4	100	n/a	0	0
3:20:12	6	90	79	85	6	100	n/a	0	0
3:20:18	8	90	77	85	8	100	n/a	0	0

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NFWS Bid Cap

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NFWS Bid Cap

- **NYISO uses Constraint Specific Shortage Pricing to represent the price impact that transmission shortages have on LBMP**
  - CSSP is supported by a six-step Transmission Demand Curve, in which shortage prices increase in tandem with further utilization of a transmission facility's Constraint Reliability Margin (CRM)
    - NYISO reserves a portion of a transmission facility's transmission capacity, between a market limit and a hard limit, its line rating, and the CRM
    - The CRM insulates the system from severe overload risk by allowing transmission scarcity to be reflected in market prices
  - At 100% CRM utilization, flows across a transmission facility bump up against the facility's line rating, and the Transmission Demand Curve increases the price of the facility's transmission constraint to $4,000

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NFWS Bid Cap (cont.)

- **The NERC Transmission Loading Relief process is used to filter/sort external transactions for curtailment, based on their ability to effect flows across a flowgate**
  - TLR uses an individual transaction quantity-share de minimis threshold of 5% when determining whether curtailment will materially impact flows across the flowgate
- **NYISO seeks to apply similar materiality logic to Loads taking Non-Firm Withdrawal Service**
  - If the CRM of a transmission facility binds at 100% utilization, it produces a $4,000 shadow price
  - Subjecting Non-Firm Loads to a $200 bid cap would therefore ensure that, in most scenarios, Non-Firm Loads with a Shift Factor of 5% or more on the $4,000 constraint would be automatically curtailed by the market software
    - Said differently, it improves the chances that all Non-Firm Loads whose withdrawals materially affect flows across the constrained transmission facility are curtailed by the market software when the CRM is fully utilized, preventing them from exacerbating the constraint further or require manual OOM by the ISO/TO

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NFWS Bid Cap (cont.)

- **Additionally, a $200/MWh bid cap:**
  - Increases the chances that NFWS Load is curtailed before NYISO declares an SCR Event in the RTM
  - Increases the chances that NFWS Load is curtailed before the NYISO deploys certain contingency Operating Reserves as dictated by the Operating Reserve Demand Curves

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CLLC

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Demand Side Resource Eligibility Exclusion

- **Market Participants may reflect Co-Located Load flexibility in their CLLC bids, but such flexibility will not be compensable as Demand Response under Order No. 745**
  - A CLLC must contain Limited Withdrawal Service Load, curtailment of which does not carry a right to compensation
- **FWS Load curtailments provide certain benefits to the transmission system that NFWS/ZWS Load curtailments do not**
  - When a FWS Load curtails, it is foregoing, or selling back to the NYISO its right to withdraw Energy at any price and at any time
  - A FWS Load that sells ICAP as a DSR is effectively selling back a portion of its ICAP obligation, freeing up Capacity to be used to serve other non-flexible Firm Loads in peak hours

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CLLC Metering and Telemetry Requirements

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CLLC Telemetry & Metering Requirements

- NYISO proposes to require dual-channel Revenue Grade Metering and 6-second telemetry at the POI of the CLLC
- Additionally, any Load within the CLLC must install separate and individual hourly Revenue Grade Metering and 6-second Telemetry at said Load's component level

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CLLC Interconnection Rules

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ZWS Load and ERIS/CRIS

- **CLLC CRIS/ERIS requests should consider any portion of ZWS Load contained therein**
  - ERIS/CRIS is not necessary to serve ZWS Load behind-the-meter – a CLLC may therefore only need to request ERIS/CRIS if the CLLC seeks to, at any point, net inject Energy onto the transmission system
  - Curtailable ZWS Load may additionally enable the Market Participant to request CRIS/ERIS for the portion of the Co-Located Resources that serve the ZWS Load behind-the-meter
    - Curtailing ZWS Load may enable additional net injection capability onto the grid, which could increase the amount of ERIS/CRIS the MP may request from the ISO

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CLLC Capacity Market Rules

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CLLCs – DMNC Testing

- **Composite Co-Located Resources will perform a single joint DMNC test**
  - Composite Co-Located Resource DMNC test response will be measured at the CLLC's POI net meter
  - Flexible Co-Located Load may curtail during the test to improve DMNC test results
    - Provided, however, that the CLLC may subsequently become reliant on Co-Located Load curtailments to comply with the CLLC's Bid/Schedule/Notify obligations should the ICAP made available via these curtailments be offered at auction
    - I.e. if the Composite Co-Located Resource's UCAP sales are predicated on Co-Located Load flexibility, the MP is required to reflect that flexibility in its bids and in real-time operations

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CLLC Energy Market Rules

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CLLC Bidding –Operating Limits

- **The maximum net withdrawal and net injection capability of a CLLC will be dictated by the facility's physical Point of Injection and Point of Withdrawal Limits**
  - For example, a CLLC with a physical POW Limit of -20MW and a physical POI Limit of 40MW would be able to submit a single net Energy bid ranging from -20MW of net withdrawals up to 40MW of net injections
- **A CLLC can further tailor their desired maximum and minimum net output over the course of a market interval using bid-in Upper and Lower Operating Limits**
  - The bid-in UOL/LOL should be structured such that they reflect the Withdrawal Service rights of a CLLC's Co-Located Load, inclusive of any Co-Located Resource injection capability
  - Note that CLLCs, like other Resources, be subject to physical withholding or other market mitigation measures if they purposefully misrepresent their capabilities to the markets

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CLLC Settlements

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Make Whole Payments/Station Power

- **CLLCs will be broadly excluded from make whole payment (DAM/RTM BPCG, DAMAP, etc.) eligibility on both the supply and withdrawal side of their operating range**
  - CLLCs are unique in that they operate in the markets as both as a non-ESR Load and a Generator
  - NYISO would therefore like to gain working experience with the CLLC model to potentially inform later enhancements to integrate make whole payments into the design

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Deviation Charge Example

For the real-time interval 1:00 – 1:05		
A	Total Facility NFWS Load MW	100
B	Scheduled withdrawal (MW)	90
C	Actual Energy Withdrawals (MW)	100
D	Deviation charge tolerance (MW) = A x 5%	5
E	Day-Ahead Regulation Capacity Clearing Price ($/MWh)	7
F	Real-time Regulation Capacity Clearing Price ($/MWh)	8
E	**Deviation charge ($) = (C – B – D) x Max (E , F) x (300 seconds/3600 seconds)**	$3.33

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CLLC Bidding and Scheduling Examples

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CLLC Bidding Example – Standalone NFWS

- Assume a CLLC consists only of NFWS Load that has a maximum demand of 150MW
- The CLLS desires to withdraw from the grid, and therefore submits an Energy withdrawal bid in the DAM
  - Subject to the bid cap of $200/MWh
- The market software will schedule this CLLC to withdraw a full 150MWh until the CLLC's nodal LBMP exceeds $200/MWh
  - Once the threshold is reached, the optimization will instruct this Load to curtail

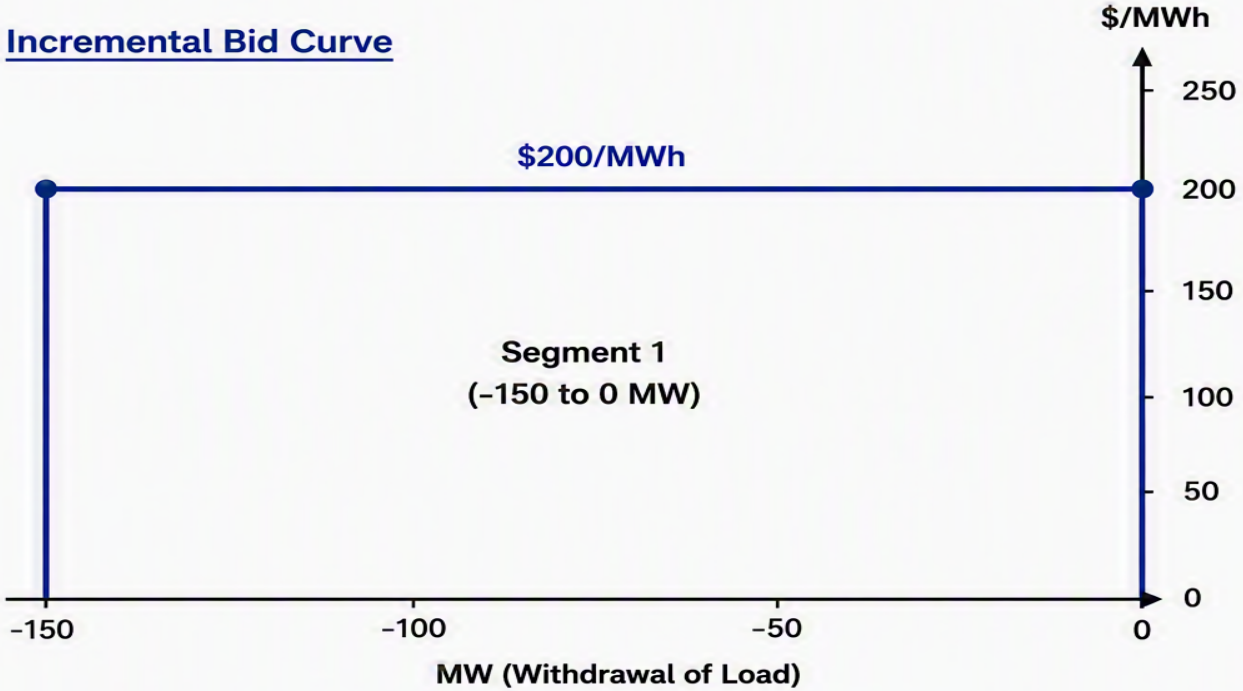
Bid Segment	MW	Bid Price
1	-150	$200

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Basic NFWS Load Bid Example

Incremental Bid Curve



$200/MWh Step =
Non-Firm Withdrawal Service Bid Price Cap

This is a **mandatory curtailment** threshold.

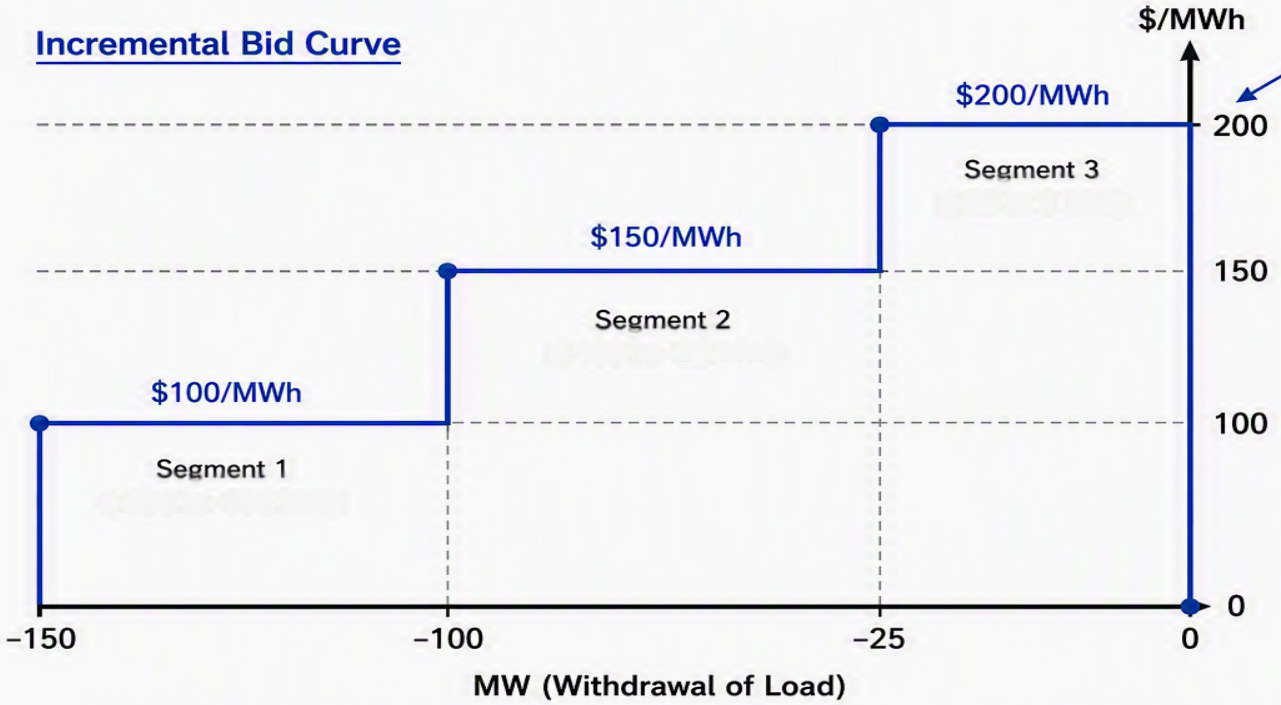
If LBMP exceeds $200/MWh, the Load must fully curtail and cannot consume any Energy (0 MW withdrawal).

Bid Segment	MW (Withdrawal)	Bid Price ($/MWh)
1	–150	200

- Incremental bid curve: higher prices correspond to less (smaller magnitude) withdrawal of load.
- Bounded by minimum demand of 0 MW (no withdrawal) and maximum demand of –150 MW (maximum withdrawal).

Price Responsive Load Bidding Example

Incremental Bid Curve



$200/MWh Step =
Non-Firm Withdrawal Service Bid Price Cap

This is a **mandatory curtailment threshold.** If LBMP exceeds $200/MWh, the Load must fully curtail and cannot consume any Energy (0 MW withdrawal).

Bid Segment	MW (Withdrawal)	Bid Price ($/MWh)
1	−150	100
2	−100	150
3	−25	200

- Incremental bid curve: higher prices correspond to less (smaller magnitude) withdrawal of load.
- Bounded by minimum demand of 0 MW (no withdrawal) and maximum demand of −150 MW (maximum withdrawal).

Structuring CLLC Bids to Accommodate Partial Firm Withdrawal Service Load

- **A CLLC that contains Partial Firm Withdrawal Service Load will have a right to withdraw from the transmission system consistent with the amount of Firm Withdrawal Service rights the CLLC was awarded**
  - To ensure the CLLC can exercise this right to withdraw, the MP will need to structure the CLLC bids such that:
    - The CLLC self-schedules to withdraw up to it's FWS rights
    - The CLLC structures its bid and bid-in operating limits such that the CLLC's resulting net schedule will, regardless of dispatch instruction, always honor the CLLC's firm withdrawal rights
- **The following slides describe how a Market Participant could structure their bids to yield these results**
  - Note that these slides do not describe bidding rules, but provide several examples of bidding behavior – choices that the MP can make in structuring their bids to reflect the business use case of their CLLC
  - The MP can still bid the FWS Load into the markets as being price responsive if desired, in which case the MP would ignore the guidance provided on the following slides

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Structuring CLLC Bids to Accommodate Partial Firm Withdrawal Service Load

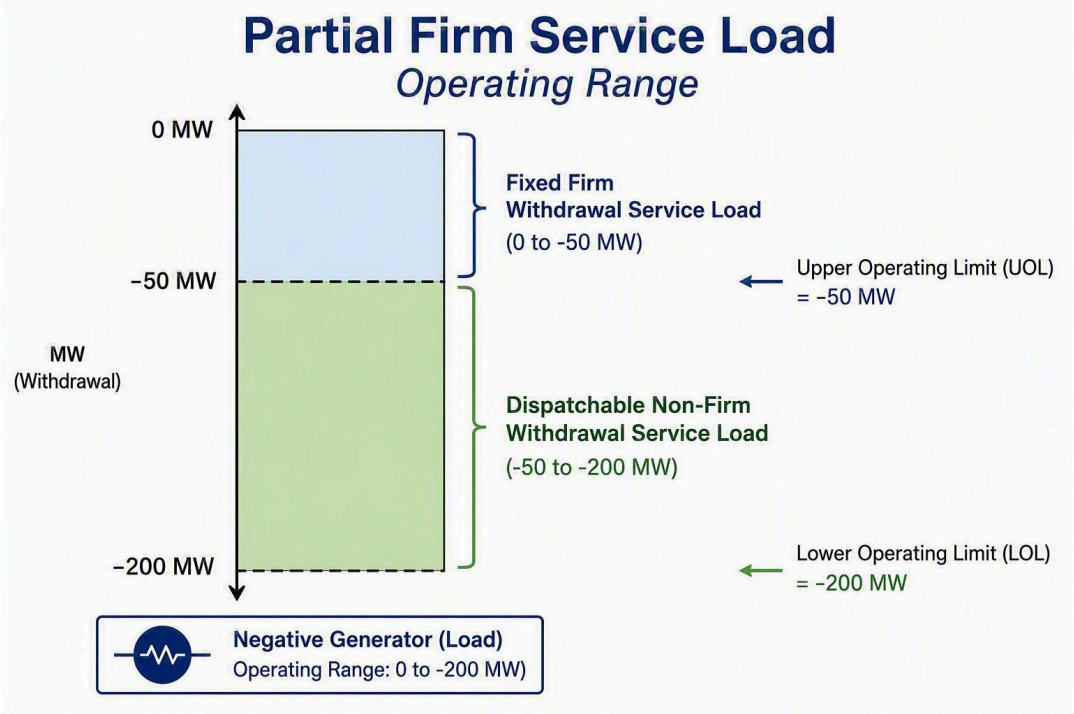
- **A CLLC comprised only of PFWS Load that seeks to preserve its FWS rights should structure its bid such that its bid-in Upper Operating Limit (the least negative point on the bid curve) reflects the amount of FWS Load that the CLLC intends or desires to take**
  - For example, if a CLLC has 30MW of FWS that it would like to fully serve via grid-tied withdrawals in a given market interval, then the CLLC's Energy withdrawal bid in that hour should have a UOL of -30MWh
    - The UOL essentially communicates a **"minimum feasible demand level"** to the optimization, helping to ensure that the portion of the Load taking FWS receives a schedule to withdraw
    - Without the bid structured as such, the optimization may subject FWS Load to curtailment based on the economics of the full withdrawal bid – this may be desirable, depending on how much Energy the Load intends to consume over the hour
- **The CLLC's bid-in Lower Operating Limit (the most negative point on the bid curve) should then be set such that it reflects the CLLC's total maximum demand**
  - The portion of the withdrawal bid that lies between the specified LOL and the UOL represents the dispatchable portion of the CLLC's operating range - i.e. the portion of the bid that represents any NFWS that the CLLC is taking

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Limited Withdrawal Rights – PFWS Bid Example

- **Assume a Large Load with a maximum demand of 200MW**
  - 50MW of Firm Service
  - 150MW of Non-Firm Service
- **The figure to the right describes the Load's operating range**
  - By specifying a UOL of -50MW, the MP ensures that, under most conditions, the optimization schedules it for no less than 50MW of withdrawals
  - The MP's bid curve would express price responsivity across the rest of the operating range
    - Because the remaining 150MW of Load is classified as NFWS, it is subject to the $200/MWh bid price cap, and must be dispatchable

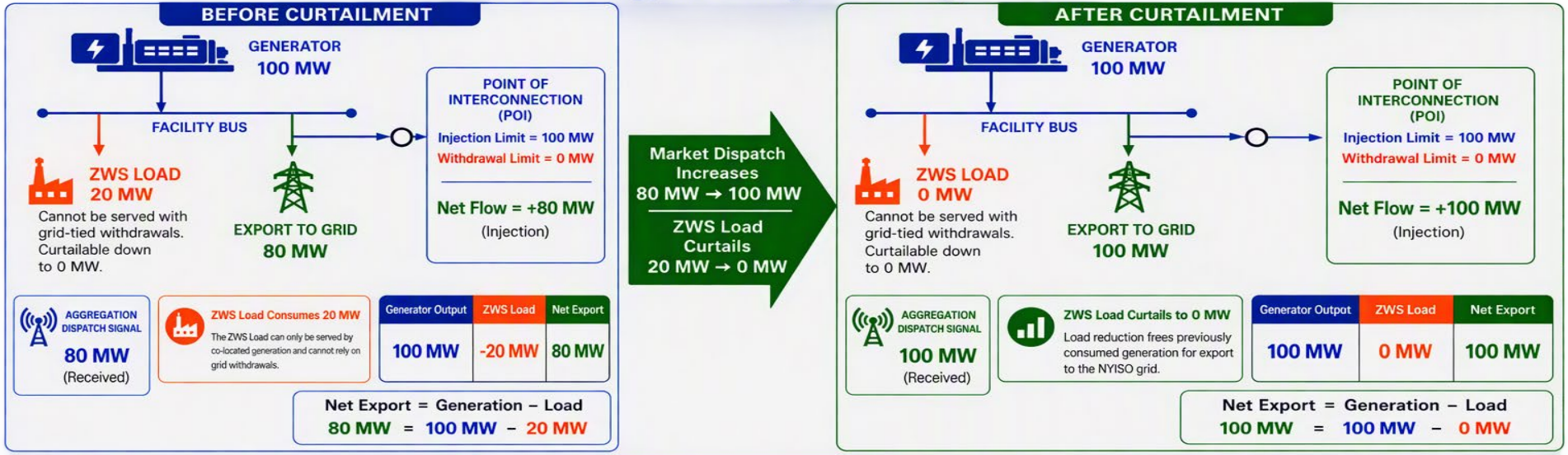


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CLLC - Curtailable ZWS Load + Net Injection Capability Example

Single Net Energy Bid • Single Net Energy Schedule



RESOURCE ADEQUACY CONTEXT

- Aggregation granted **100 MW** of CRIS by the NYISO.
- Aggregation sold **100 MW** of ICAP at auction.
- Therefore, this Aggregation has an obligation to B/S/N for its full **100 MW** of injection capability.

KEY TAKEAWAYS

- The Co-Located Load Aggregation submits a single net Energy bid.
- The Co-Located Load Aggregation receives a single net Energy schedule.
- In the BEFORE case, the Aggregation receives an **80 MW** dispatch signal.
- In the AFTER case, the Aggregation receives a **100 MW** dispatch signal.
- Generator output remains **100 MW** in both scenarios.
- The ZWS Load is curtailable from **20 MW** to **0 MW**.
- Curtailing the ZWS Load increases net exports from **80 MW** to **100 MW**.
- The Aggregation provides a **20 MW** increase in grid injection without increasing generation output.
- The POI Injection Limit remains binding at **100 MW**.
- ZWS Load curtailment may enable the Aggregation to request **100 MW** of Generator CRIS, ultimately enabling the Aggregation to offer more ICAP at auction than if the ZWS Load could not curtail.

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CLLC – Bid-In Operating Limit Examples

- **The following slides illustrate how the different withdrawal services/ZWS might affect the bid-in Operating Limits of a CLLC**
  - These examples will first demonstrate how different individual types of withdrawal/ZWS could affect the UOL and LOL of a CLLC
  - The final examples will demonstrate how a CLLC containing a Load that is simultaneously taking multiple types of withdrawal service/ZWS might fold all such services into the CLLC's net Energy bid using the UOL and LOL
  - These are simple examples to illustrate how the Market Participant can use LOL and UOL to effectuate implied Load schedules – they are not meant to illustrate the CLLC's de facto 11-point decremental Energy market bid curve

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Incorporating FWS Load MW into CLL Net Energy Bid

- **As described in prior examples, the Market Participant representing a CLLC should decrease the CLLC's UOL by the amount of FWS Load they intend to serve with grid-tied withdrawals over the course of a bidding interval**
  - The MP should tailor their bid-in Upper Operating Limit such the NYISO's market software does not curtail the FWS Load
- **As an example, assume a CLLC comprised of 20MWs of FWS Load and 60MW of Co-Located Generation (this combination is infeasible, example for illustrative purposes only) – the CLL Aggregator wants to ensure that their 20MW of FWS Load is always served, either by co-located generation or by grid-tied withdrawals**
  - NYISO would expect the MP to submit an LOL of -20MW, to reflect the fact that the FWS Load will still be withdrawing when the co-located Generator is dispatched off
  - NYISO would expect the MP to submit a UOL of 40MW, to reflect the fact that the FWS Load will still be consuming 20MW of Energy behind-the-meter, even when the co-located Generator is on and running at its full 60MW output
    - If the MP does not set designate a bid-in UOL of 40MW in their net Energy bid, and instead designates a higher bid-in UOL of 60MW, this tells the optimization that the Aggregation can be scheduled for up to 60MW of net injections.
    - The only way for the CLLC to achieve this outcome would be for the FWS Load to curtail to 0MW of Load while the Generator is injecting it's full 60MW capability

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Incorporating FWS Load Into CLLC Bid

Assume the CLLC plans for its FWS Load to withdraw up to 20 MW during this bid interval.

CLLC COMPOSITION



Co-Located Generation
60 MW

\+



FWS Load (withdrawals)
–20 MW

CLLC BID-IN OPERATING LIMITS

LOL (Lower Operating Limit)
–20 MW
(FWS Load always withdrawing 20 MW)

UOL (Upper Operating Limit)
40 MW
(FWS Load still consuming 20 MW when Gen at 60 MW)

Net output of the CLLC is constrained between –20 MW and 40 MW.

FWS Load (-20 MW) is always scheduled to withdraw.

1) GENERATOR OFF (MIN OUTPUT)



FWS Load still withdrawing –20 MW

NET OUTPUT OF CLLC (MW)



Net Output = –20 MW

Generation Output	FWS Load (Withdrawal)
0 MW	–20 MW

Net Output of CLLC
–20 MW

2) GENERATOR ON (MAX OUTPUT)



FWS Load still withdrawing –20 MW

NET OUTPUT OF CLLC (MW)



Net Output = 40 MW

Generation Output	FWS Load (Withdrawal)
60 MW	–20 MW

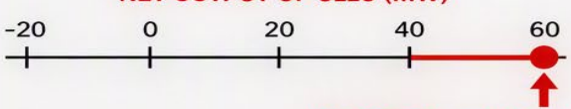
Net Output of CLLC
40 MW

3) IF UOL NOT SET TO 40 MW (EX: UOL = 60 MW)



Only way to reach 60 MW net output is for FWS Load to drop to zero.

NET OUTPUT OF CLLC (MW)



Net Output = 60 MW

Generation Output	FWS Load (Withdrawal)
60 MW	0 MW

Net Output of CLLC
60 MW

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Incorporating ZWS Load MW into CLLC Net Energy Bid

- **ZWS Load cannot be served by the Grid – it's withdrawals can only be served by co-located generation**
  - Like, FWS Load, a CLLC MP should reflect any planned ZWS Load withdrawals in it's CLLC's bid-in UOL for a given bid interval
  - Unlike FWS Load, ZWS Load MW should not be reflected in the LOL of the CLLC
    - The ZWS Load has no withdrawal rights – if the Aggregator designates a nonzero LOL in the CLLC's single net Energy bid, the CLLC could incorrectly get scheduled for net withdrawals
- **As an example, assume an MP seeks to ensure that their CLLC, which contains 10MW of ZWS Load and 40MW of Co-Located Resources, is bidding such that the 10MW of ZWS Load can always be fully served by the Co-Located Resources when the Resources are on**
  - NYISO would expect the MP to submit an LOL of 0MW, to reflect the fact that the ZWS Load is not able to net withdraw across the POI, even when the Co-Located Resources are off
  - NYISO would expect the MP to submit a UOL of 30MW, to reflect the fact that the ZWS Load will still be consuming 10MW of Energy behind-the-meter when the Co-Located Resources are on and running at their full 40MW output
    - If the MP does not set designate a bid-in UOL of 30MW in their net Energy bid, and instead designates a higher bid-in UOL of 40MW, this tells the optimization that the CLLC can be scheduled for up to 40MW of net injections.
    - The only way for the CLLC to achieve this outcome would be for the ZWS Load to curtail to 0MW of Load while the Co-Located Resources are injecting their full 40MW capability

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Incorporating ZWS Load Into CLLC Bid

Assume the CLLC seeks to ensure its 10 MW ZWS Load can always be fully served by the co-located Generator.

CLLC COMPOSITION



Co-Located Generation
40 MW

+



ZWS Load (non-withdrawable)
-10 MW

CLLC BID-IN OPERATING LIMITS

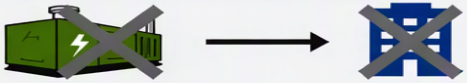
LOL (Lower Operating Limit)
0 MW
ZWS Load is not able to net withdraw across the POI.

UOL (Upper Operating Limit)
30 MW
ZWS Load still consuming -10 MW when Gen at 40 MW (max).

Net output of the CLLC is constrained between 0 MW and 30 MW.

ZWS Load (-10 MW) is always fully served by the Generator.

1) GENERATOR AND LOAD OFF (MIN OUTPUT)



ZWS Load is off (0 MW) because Generator is off.

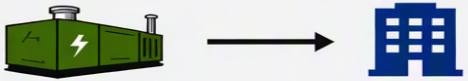
NET OUTPUT OF CLLC (MW)



Generation Output	ZWS Load (Non-Withdrawable)
0 MW	0 MW

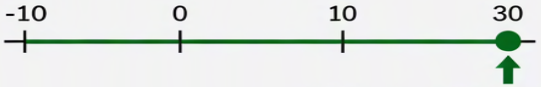
Net Output of CLLC
0 MW

2) GENERATOR ON (MAX OUTPUT)



ZWS Load still consuming -10 MW

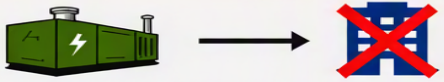
NET OUTPUT OF CLLC (MW)



Generation Output	ZWS Load (Non-Withdrawable)
40 MW	-10 MW

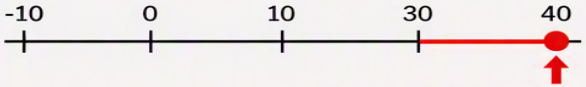
Net Output of CLLC
30 MW

3) IF UOL NOT SET TO 30 MW (EX: UOL = 40 MW)



Only way to reach 40 MW net output is for ZWS Load to curtail to 0 MW.

NET OUTPUT OF CLLC (MW)



Generation Output	ZWS Load (Non-Withdrawable)
40 MW	0 MW

Net Output of CLLC
40 MW

If the UOL is not set to 30 MW and is instead set higher (e.g., 40 MW), the optimization could dispatch the CLLC up to 40 MW net output.
The only way to reach 40 MW is for the ZWS Load to curtail to 0 MW while the Generator injects its full 40 MW capability.

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Incorporating NFWS Load MW into CLLC Net Energy Bid

- **NFWS Load can be conditionally served by the Grid**
  - Unlike FWS Load and ZWS Load, NFWS Load MW should not be reflected in the CLLC's UOL as a reduction in maximum net injection capability
    - This is because NFWS Load MW are curtailable by default, and are required to curtail to zero when the CLLC's nodal LBMP exceeds $200/MWh
  - The NFWS Load does have Limited Withdrawal Rights – it should therefore be reflected in the CLLC's LOL, to ensure the CLLC can serve the Load with grid-tied withdrawals while it's Co-Located Resources are off and the CLLC's nodal LBMP is <$200/MWh
- **For example, assume an MP is managing a CLLC that contains -30MW of NFWS Load, and 80MW of Co-Located Resources**
  - NYISO would expect the MP to submit an LOL of -30MW, to reflect the fact that the NFWS Load can withdraw up to 30MW while the Co-Located Resources are off
  - NYISO would expect the MP to submit a UOL of 80MW, to reflect the fact that, at some point, the NFWS Load will be required to curtail, and the Co-Located Resources will be capable of net injecting it's full capability onto the grid

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Incorporating NFWS Load Into CLLC Bid

Assume the CLLC is managing a CLLC that contains –30 MW of NFWS Load and 80 MW of co-located Generation.

CLLC COMPOSITION



Co-Located Generation
80 MW

\+



NFWS Load (curtailable)
–30 MW

ⓘ NFWS Load can be conditionally served by the Grid (≤ $200/MWh). It must curtail to 0 MW when LBMP ≥ $200/MWh.

CLLC BID-IN OPERATING LIMITS

LOL (Lower Operating Limit)
–30 MW
NFWS Load can withdraw up to 30 MW when Gen is off and LBMP < $200/MWh.

UOL (Upper Operating Limit)
80 MW
At some point, NFWS Load will be required to curtail (0 MW) and Gen can inject up to 80 MW.

ⓘ NFWS Load MW are NOT reflected in the UOL because they are curtailable by default and must drop to 0 MW when LBMP ≥ $200/MWh.

Net output of the CLLC is constrained between –30 MW and 80 MW.

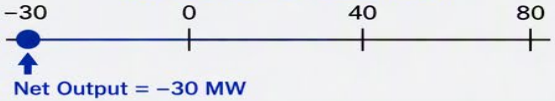
LOL reflects NFWS Load's Limited Withdrawal Rights. UOL reflects Generator's full capability once NFWS Load is curtailed.

1) GENERATOR OFF (MIN OUTPUT)



NFWS Load withdrawing up to –30 MW
(LBMP < $200/MWh)

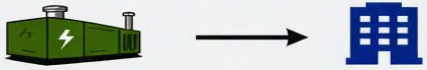
NET OUTPUT OF CLLC (MW)



Generation Output	NFWS Load (Withdrawal)
0 MW	–30 MW

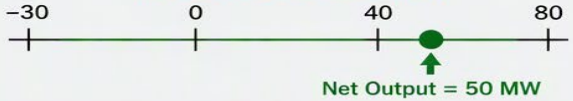
Net Output of CLLC
–30 MW

2) GENERATOR ON (PARTIAL OUTPUT)



NFWS Load still withdrawing –30 MW
(LBMP < $200/MWh)

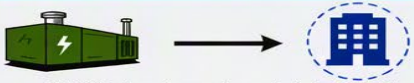
NET OUTPUT OF CLLC (MW)



Generation Output	NFWS Load (Withdrawal)
80 MW	–30 MW

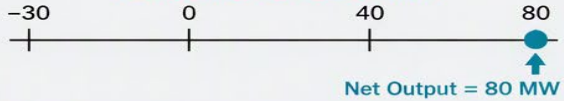
Net Output of CLLC
50 MW

3) NFWS LOAD CURTAILED (LBMP ≥ $200/MWh)



NFWS Load must curtail to 0 MW
when LBMP ≥ $200/MWh

NET OUTPUT OF CLLC (MW)



Generation Output	NFWS Load (Withdrawal)
80 MW	0 MW

Net Output of CLLC
80 MW

NFWS Load is reflected in the LOL (–30 MW) to preserve its Limited Withdrawal Rights when LBMP < $200/MWh.
It is not reflected in the UOL because it must curtail to *0 MW* when LBMP ≥ $200/MWh, allowing the Generator to net inject up to 80 MW.

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Incorporating Load w/ Multiple Service Qualifications into CLL Net Energy Bid

- Assume a 60MW Load simultaneously takes 10MW of ZWS, 35MW of NFWS, and 20MW of FWS, and it co-locates with a 100MW Generator to form a CLLC
- Additionally, assume the CLL Aggregator wants to structure the CLLC's Energy bid so that the FWS Load seeks to always consume 20MW, and the ZWS Load seeks to always consume 10MW of Load while the Generator is on
  - NYISO would expect the bid-in LOL of the CLLC to be set to -55MW
    - The negative portion of the CLL's operating range represents the maximum amount of FWS (20MW) and NFWS (35MW) that the CLLC could be scheduled for when the Generator is off
  - NYISO would expect the bid-in UOL of the CLLC to be set to 70MW
    - The positive portion of the CLLC's operating range represents the maximum net injection capability that the Aggregation can achieve after NFWS Load (35MW) has been curtailed to 0MW when the FWS Load (20MW) and ZWS Load (10MW) are consuming at max demand

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Proposed Tariff Revisions

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Draft Tariff Revisions

- **NYISO has drafted a set of proposed Tariff revisions in both the MST and the OATT to integrate the proposed Large Load market and planning rules into NYISO Tariffs**
  - Redlined Tariff sections are posted with today's meeting materials
    - Incremental revisions made after the 10/7 ICAPWG are denoted by red font in the following slides

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MST

- **Definitions**
  - New: Large Load, Computational Large Load, Co-Located and Limited Load Configuration, Co-Located Arrangement, Co-Located Load, Co-Located Resource, Co-Located Local Load, Co-Located Local Generator, Co-Located Supply, Composite Co-Located Resource, Firm/Non-Firm Withdrawal Service, Gross Load, Limited Withdrawal Service Load, Partner Resource Arrangement, System Reliability Benefit Fee, Zero Withdrawal Service Load
  - Updates to existing definitions to reflect proposed design
  - Definitions revised to reflect sunset of the BTM:NG Resource program, removal of Capacity Limited Resources
- **MST 3.5.2**
  - LSE data reporting obligations for Large Loads
- **MST 4.1**
  - New provision that DSR > 20 MW will not be allowed to Aggregate with other Resources
  - Aggregations cannot be part of a CLLC, and Generators in a CLLC can not also participate as part of an Aggregation
  - New section 4.1.12 Composition of Co-Located Limited Load Configurations
  - New section 4.1.13 Partner and Co-Located Arrangements
- **MST 4.2, 4.4**
  - DAM and RT bidding requirements and settlement for Large Loads and Co-Located Load Configurations

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MST (continued)

- **MST 4.1.10, 4.2.3, 4.3, 4.5, 15.3A**
  - Removal of Capacity Limited Resource language
- **MST 4.5**
  - CLLCs subject to balancing settlement rules
- **MST 5.11**
  - Exclusion of Loads taking NFWS from Peak Load Forecasts, since these loads will not have a capacity obligation
- **MST 5.12**
  - CLLC ICAP Supplier requirements
- **MST 5.13**
  - Co-Located and Partner Arrangement ICAP obligation requirements

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MST (continued)

- **MST 5.18**
  - Rules for Associated Resources transitioning into IIFO or Mothball Outage and simultaneous transition of associated Large Load from FWS to NFWS
  - Outage scheduling provisions for CLLC
- **MST 7.4**
  - Reporting of Large Load meter data to the ISO
- **MST 8.2**
  - Components of a CLLC must be under the same bidding entity and same billing organization
- **MST 13**
  - Metering requirements for Large Loads and CLLCs
- **MST 15.2**
  - Details on Voltage Support Service compensation
- **MST 15.3**
  - CLLCs are not eligible to provide Regulation Service

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MST (continued)

- **MST 15.3B**
  - Deviation charges for Limited Withdrawal Service Loads
- **MST 17.1.3**
  - Day-Ahead Commitment of CLLC
- **MST 18**
  - Exclusion of CLLC from Day-Ahead Bid Production Cost guarantee payment eligibility
- **MST 21**
  - NFWS and PFWS bid cap language ($200/MWh)
- **MST 23.2 & 23.3**
  - Addition of Partnered Resource and Co-Located Arrangement to the definition of Excluded Facilities
  - Addition of resources addressing RNA or STAR needs to the definition of Excluded Facilities
  - Reference Levels and energy market monitoring measures for CLLCs
- **MST 25**
  - Exclusion of CLLC from DAMAP

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OATT

- **OATT 1.14**
  - Added definitions present elsewhere in the tariff
- **OATT 2.7.4**
  - Mirrors MST 7.4.1 language for meter data reporting
- **OATT 3.9**
  - Reference to LLIP within Study Procedures for New Load
- **OATT 3.10**
  - Large Load Project subject to prioritization process in LLIP
- **OATT 4.5**
  - Reference to LLIP within Study Procedures for New Load
- **OATT 3A**
  - New section to describe FWS, PFWS, and NFWS, as well as OOM responsiveness requirement for PFWS and NFWS
- **OATT 6.2, 6.3, 6.5, and 6.17-19**
  - Rate schedule updates to ensure that charges will be assessed on a gross load basis
- **OATT 6.23**
  - New section to describe the System Reliability Benefit Charge

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OATT (continued)

- **OATT 8 Attachment B**
  - Form of Service Agreement for Firm and Non-Firm Withdrawal Service for Large Loads
- **OATT 24.2 & 24.4**
  - DSR baseline enhancements to integrate the MBMA/ECBL proposal
  - New provision that Aggregation UOL must reflect actual Load reduction capability
  - The Aggregator is responsible for the calculation of the Baseline Load and the resulting Demand Reductions communicated through telemetry and settlement data provided to the NYISO on their behalf by the Meter Authority and shall be subject to any applicable penalties.
- **OATT 38**
  - Reference to MST 5.18 IIFO and Mothball Outage provisions for Large Loads
- **OATT 40.25**
  - Adding CLLC to Interconnection Request form
- **OATT 40.5**
  - ERIS rules for CLLCs
- **OATT Attachment LL + Appendices**

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